

Highly Confidential - Subject to Further Confidentiality Review

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IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF OHIO
EASTERN DIVISION

- - -

IN RE: NATIONAL : MDL NO. 2804
PRESCRIPTION OPIATE :
LITIGATION :

: CASE NO.
THIS DOCUMENT : 1:17-MD-2804
RELATES TO ALL CASES:
: Hon. Dan A.
: Polster

- - -

Tuesday, January 15, 2019

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Videotaped deposition of
LINDA KITLINSKI, taken pursuant to
notice, was held at Golkow Litigation
Services, One Liberty Place, 1650 Market
Street, Suite 5150, Philadelphia,
Pennsylvania 19103, beginning at 9:05
a.m., on the above date, before Amanda
Dee Maslynsky-Miller, a Certified
Realtime Reporter.

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I N D E X
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Testimony of: LINDA KITLINSKI

By Ms. Aminolroaya
By Mr. Buchanan
By Mr. Davis

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<p>1 - - -</p> <p>2 E X H I B I T S</p> <p>3 - - -</p> <p>4 NO DESCRIPTION PAGE</p> <p>5 Endo-Kitlinski</p> <p>6 Exhibit-46 ENDO-OPIOID_MDL_DEPONENT-</p> <p>7 000015904-16398 379</p> <p>8 Endo-Kitlinski</p> <p>9 Exhibit-47 Hard drive 421</p> <p>10 Endo-Kitlinski</p> <p>11 Exhibit-48 ENDO-OPIOID_MDL-04908487-</p> <p>12 488, with attachment 426</p> <p>13 Endo-Kitlinski</p> <p>14 Exhibit-49 No Bates</p> <p>15 Amended Subpoena to Testify</p> <p>16 At a Deposition in a</p> <p>17 Civil Action 432</p> <p>18 Endo-Kitlinski</p> <p>19 Exhibit-50 ENDO-OPIOID_MDL-01769386-</p> <p>20 592 495</p> <p>21 Endo-Kitlinski</p> <p>22 Exhibit-51 ENDO-OPIOID_MDL-02343835,</p> <p>23 With attachment 594</p> <p>24 Endo-Kitlinski</p> <p> Exhibit-52 ENDO-OPIOID_MDL_DEPONENT</p> <p> 000000184-189 617</p>	<p>1 - - -</p> <p>2 (It is hereby stipulated and</p> <p>3 agreed by and among counsel that</p> <p>4 sealing, filing and certification</p> <p>5 are waived; and that all</p> <p>6 objections, except as to the form</p> <p>7 of the question, will be reserved</p> <p>8 until the time of trial.)</p> <p>9 - - -</p> <p>10 VIDEO TECHNICIAN: We're now</p> <p>11 on the record. My name is David</p> <p>12 Lane, the videographer for Golkow</p> <p>13 Litigation Services. Today's date</p> <p>14 is January 15th, 2019. Our time</p> <p>15 is 9:05 a m.</p> <p>16 This deposition is taking</p> <p>17 place in Philadelphia,</p> <p>18 Pennsylvania, in the matter of</p> <p>19 National Prescription Opiate</p> <p>20 Litigation, MDL. The deponent</p> <p>21 today is Linda Kitlinski. Our</p> <p>22 counsel will be noted on the</p> <p>23 stenographic record. Our court</p> <p>24 reporter today is Amanda Miller</p>
Page 11	Page 13
<p>1 - - -</p> <p>2 DEPOSITION SUPPORT INDEX</p> <p>3 - - -</p> <p>4 </p> <p>5 Direction to Witness Not to Answer</p> <p>6 Page Line Page Line Page Line</p> <p>7 284 11</p> <p>8 </p> <p>9 </p> <p>10 Request for Production of Documents</p> <p>11 Page Line Page Line Page Line</p> <p>12 None</p> <p>13 </p> <p>14 </p> <p>15 Stipulations</p> <p>16 Page Line Page Line Page Line</p> <p>17 12 1</p> <p>18 </p> <p>19 </p> <p>20 Question Marked</p> <p>21 Page Line Page Line Page Line</p> <p>22 None</p> <p>23 </p> <p>24 </p>	<p>1 and will now swear in the witness.</p> <p>2 - - -</p> <p>3 LINDA KITLINSKI, after</p> <p>4 having been duly sworn, was</p> <p>5 examined and testified as follows:</p> <p>6 - - -</p> <p>7 VIDEO TECHNICIAN: Please</p> <p>8 begin.</p> <p>9 - - -</p> <p>10 EXAMINATION</p> <p>11 - - -</p> <p>12 BY MS. AMINOLROAYA:</p> <p>13 Q. Good morning, Ms. Kitlinski.</p> <p>14 We met a few moments ago off the record.</p> <p>15 My name is Parvin Aminolroaya, and I</p> <p>16 represent some of the plaintiffs in the</p> <p>17 opioid litigation.</p> <p>18 Would you please state your</p> <p>19 name for the record?</p> <p>20 A. Linda Ann Kitlinski.</p> <p>21 Q. And have you ever been</p> <p>22 deposed before, Ms. Kitlinski?</p> <p>23 A. No, I have not.</p> <p>24 Q. So I'm just going to go over</p>

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<p style="text-align: right;">Page 14</p> <p>1 a few ground rules. Your counsel may 2 have gone over them, but I want to make 3 sure we're on the same page. 4 If you don't understand a 5 question, please tell me. And I will be 6 asking a lot of questions throughout the 7 day, there may be times when I don't 8 succeed in asking a question that you 9 understand. Just let me know. 10 Otherwise, the record will reflect that 11 the question was understood. 12 I'll ask you to answer with 13 a verbal yes or no. Please don't nod or 14 shake your head. The court reporter 15 should be able to take down what we're 16 saying. 17 And in the course of normal 18 conversation, sometimes you can 19 anticipate what I'm saying so you may 20 know the answer before I even finish the 21 question. But for purposes of having a 22 clean record, please wait until I finish 23 my question before giving your answer. 24 And I'll remind you of that if it seems</p>	<p style="text-align: right;">Page 16</p> <p>1 A. No. 2 VIDEO TECHNICIAN: Going off 3 the record. 9:08 a.m. 4 - - - 5 (Whereupon, a brief recess 6 was taken.) 7 - - - 8 VIDEO TECHNICIAN: We're 9 back on record at 9:10 a.m. 10 BY MS. AMINOLROAYA: 11 Q. We just took a short break 12 to handle a small technical issue. We're 13 back on the record. 14 Ms. Kitlinski, what did you 15 do to prepare for your testimony today? 16 A. I read the subpoena 17 documents thoroughly. I went through my 18 files, gathered up the requisite 19 materials that were referenced in there, 20 provided those to counsel. Met with 21 counsel on three occasions for a few 22 hours. And I'm here today. 23 Q. And when did you first 24 receive a subpoena?</p>
<p style="text-align: right;">Page 15</p> <p>1 like we're talking over each other during 2 the deposition. 3 We can take a break whenever 4 you need, just let me know. The only 5 thing I would ask is that if there's a 6 question pending, you answer the 7 question. 8 Do you understand these 9 instructions? 10 A. Yes, I do. 11 Q. And do you understand that 12 you're under oath as if you were in a 13 court of law before Judge Polster in 14 Ohio? 15 A. Yes, I do. 16 Q. And if you don't know an 17 answer to a question or can't recall, 18 just let me know. But please don't 19 guess. However, we are entitled to your 20 best recollection. 21 Is there anything we should 22 know that would prevent you from 23 testifying truthfully and to the best of 24 your ability today?</p>	<p style="text-align: right;">Page 17</p> <p>1 A. I'm going to say it was in 2 October. That's a guess. It was prior 3 to the first week of November, I know 4 that, but I don't know the exact date. 5 Q. And what did you do to 6 undertake the thorough search you just 7 described in response to the subpoena? 8 A. Well, I went through my 9 personal -- first of all, the documents 10 that I had in my possession were 11 subsequent to my employment from Endo. I 12 had turned everything in, you know, when 13 I retired, or during subsequent -- I 14 mean, during the orders that they had in 15 place prior to that time. 16 So I went through my 17 materials. And I extracted anything that 18 had anything to do with opioids or the 19 other criteria that were listed in the 20 subpoena. 21 I did a key word search, and 22 I have on my -- on my computer the -- any 23 of the documents that -- as well as on my 24 laptop, on my thumb drive, I have one</p>

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<p style="text-align: right;">Page 18</p> <p>1 thumb drive that I have used since</p> <p>2 leaving Endo, and that's where I have</p> <p>3 looked for those documents.</p> <p>4 Q. What search terms did you</p> <p>5 use?</p> <p>6 A. Anything related to opioids,</p> <p>7 you know -- they were listed in your</p> <p>8 document there, opioids, oxymorphone,</p> <p>9 Opana, REMS.</p> <p>10 Q. And where on your computer</p> <p>11 did you search?</p> <p>12 A. I searched my desktop, and I</p> <p>13 searched in my -- in my folders. And I</p> <p>14 searched the thumb drive that I use. I</p> <p>15 also searched in through my e-mails. The</p> <p>16 majority of my e-mails were, shall I say,</p> <p>17 a combination of junk mail that you get</p> <p>18 from, you know, people soliciting your</p> <p>19 participation in things not related to</p> <p>20 this case, you know, just regular,</p> <p>21 everyday coupons and that type of thing.</p> <p>22 The other e-mails in my</p> <p>23 files were copied to the folks at the</p> <p>24 REMS, now Syneos, previously Campbell</p>	<p style="text-align: right;">Page 20</p> <p>1 that was not related to the subpoena and</p> <p>2 this case, retained those family</p> <p>3 documents.</p> <p>4 Q. So just to clarify, you</p> <p>5 searched the thumb drive?</p> <p>6 A. Yes.</p> <p>7 Q. And you applied the search</p> <p>8 terms that were identified in plaintiffs'</p> <p>9 subpoena?</p> <p>10 A. Yes.</p> <p>11 Q. And you turned those</p> <p>12 documents over to your counsel?</p> <p>13 A. Yes.</p> <p>14 Q. And turning to your</p> <p>15 e-mails --</p> <p>16 A. Excuse me, just to clarify.</p> <p>17 Q. Thank you.</p> <p>18 A. I turned some paper</p> <p>19 documents, which came from my files, over</p> <p>20 to counsel. And I turned the thumb drive</p> <p>21 that did not have my family information</p> <p>22 but had the information related to the --</p> <p>23 to this case.</p> <p>24 Q. And what kinds of documents</p>
<p style="text-align: right;">Page 19</p> <p>1 Alliance/inVentiv. And the conjoint</p> <p>2 committee members who participate in the</p> <p>3 REMS, again, they are also copied on the</p> <p>4 Syneos/inVentiv documents since they're</p> <p>5 in attendance at that meeting and take</p> <p>6 minutes.</p> <p>7 Q. And when did you run the</p> <p>8 search in your e-mail?</p> <p>9 A. Between the time I received</p> <p>10 the subpoena and the time that I</p> <p>11 prepared -- presented the documents to</p> <p>12 counsel this past week.</p> <p>13 I also made a copy of the</p> <p>14 relevant -- because I have a -- we have a</p> <p>15 family medical situation that we've been</p> <p>16 dealing with for about five years, and</p> <p>17 because I don't have a formal job, I</p> <p>18 don't work for a company any longer, I</p> <p>19 had that single thumb drive that I used</p> <p>20 for, you know, family personal, medical,</p> <p>21 business, as well as anything that was</p> <p>22 relating to my consulting work on the</p> <p>23 REMS.</p> <p>24 So I pulled off anything</p>	<p style="text-align: right;">Page 21</p> <p>1 were on the thumb drive?</p> <p>2 A. Oh, they were things like</p> <p>3 the minutes from the -- from the REMS</p> <p>4 meetings, the agenda, the participants.</p> <p>5 They would circulate the minutes for</p> <p>6 comments to make sure that they reflected</p> <p>7 accurately what people who participated</p> <p>8 heard.</p> <p>9 It contained the -- I</p> <p>10 believe there was a copy of the</p> <p>11 MedBiquitous REMS specs on there, which</p> <p>12 was another element of the REMS.</p> <p>13 Q. I'm sorry, I think I missed</p> <p>14 the word you said before "REMS."</p> <p>15 A. MedBiquitous. It's the</p> <p>16 Johns Hopkins organization that does the</p> <p>17 metrics for the REMS.</p> <p>18 Q. Any other categories of</p> <p>19 documents on the thumb drive?</p> <p>20 A. Those are -- that's the</p> <p>21 majority of them.</p> <p>22 And there may have been, for</p> <p>23 example, like, if I was going to a</p> <p>24 conference and, for REMS or the FDA,</p>

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<p style="text-align: right;">Page 22</p> <p>1 let's say the FDA public meeting, I would</p> <p>2 have printed out a copy at that -- you</p> <p>3 know, at that time, of the agenda and any</p> <p>4 attachments, and afterwards I might have</p> <p>5 had a copy of it retained on the thumb</p> <p>6 drive or the directions to the, you know,</p> <p>7 meeting and things like that.</p> <p>8 Q. And you talked about running</p> <p>9 the search on the thumb drive.</p> <p>10 Can you give us a better</p> <p>11 sense of when you ran the search? You</p> <p>12 said it was between October and this</p> <p>13 week, and January, correct?</p> <p>14 MR. DAVIS: Objection to</p> <p>15 form.</p> <p>16 MS. AMINOLROAYA: You can</p> <p>17 answer.</p> <p>18 MR. DAVIS: You can go</p> <p>19 ahead.</p> <p>20 BY MS. AMINOLROAYA:</p> <p>21 Q. Unless your counsel</p> <p>22 instructs you not to answer a question,</p> <p>23 and that shouldn't occur very</p> <p>24 frequently --</p>	<p style="text-align: right;">Page 24</p> <p>1 A. I provided all of the</p> <p>2 documents to counsel in January.</p> <p>3 I also provided the one</p> <p>4 notebook that I had during that time</p> <p>5 period after, you know, 2016 until the</p> <p>6 present, until the end of this past year.</p> <p>7 And I provided that notebook to counsel.</p> <p>8 Q. And -- thank you.</p> <p>9 You mentioned your e-mails,</p> <p>10 that you searched your e-mails as well</p> <p>11 and you applied the search terms in</p> <p>12 plaintiffs' subpoena to your e-mails.</p> <p>13 What's your e-mail address?</p> <p>14 A. LindaKitlinski@gmail.com.</p> <p>15 I'm sorry, Linda A, there's another A in</p> <p>16 there.</p> <p>17 Q. And how long have you</p> <p>18 maintained this e-mail address?</p> <p>19 A. That's been my e-mail</p> <p>20 address since I retired from Endo, so the</p> <p>21 middle of May 2014.</p> <p>22 Q. And to be clear, you did not</p> <p>23 have this Gmail e-mail address before May</p> <p>24 of 2014; is that right?</p>
<p style="text-align: right;">Page 23</p> <p>1 A. Sure.</p> <p>2 Q. -- you can answer the</p> <p>3 questions.</p> <p>4 A. Sure.</p> <p>5 Again, I focused on -- well,</p> <p>6 I initially started with the paper files,</p> <p>7 and I did that in the end of October and</p> <p>8 finished it up this month. Originally,</p> <p>9 the subpoena said that the deposition</p> <p>10 would be held in November, but because of</p> <p>11 my dad's medical situation, I appreciated</p> <p>12 the flexibility in being able to do it</p> <p>13 this month instead. So I had begun some</p> <p>14 things and finished them up this month.</p> <p>15 And the computer, you know,</p> <p>16 looking through the documents on my -- in</p> <p>17 my files on the thumb drive, that was in</p> <p>18 January.</p> <p>19 Q. And did you provide any</p> <p>20 documents to your counsel before January?</p> <p>21 A. No, I did not.</p> <p>22 Q. Documents that were on the</p> <p>23 thumb drive or on your computer, were</p> <p>24 those provided to counsel before January?</p>	<p style="text-align: right;">Page 25</p> <p>1 A. I had a Gmail address, I</p> <p>2 never used it. It was -- it was Linda</p> <p>3 Kitlinski, there was no A in it. And so</p> <p>4 it was inactive, and that's why, when I</p> <p>5 tried to establish one, I had to include</p> <p>6 the initial A, because it said that it</p> <p>7 was already assigned to someone. But I</p> <p>8 couldn't remember my password, so --</p> <p>9 Q. Understood. That happens.</p> <p>10 And were there any other</p> <p>11 e-mails you maintained besides the Linda</p> <p>12 Kitlinski Gmail account?</p> <p>13 A. Not since leaving Endo.</p> <p>14 Endo had my, you know, Endo e-mail</p> <p>15 address. But since leaving the company,</p> <p>16 no.</p> <p>17 Q. And while you were at Endo,</p> <p>18 were there any other personal e-mail</p> <p>19 addresses you maintained?</p> <p>20 A. No. I had just one e-mail</p> <p>21 address, and that was my Endo address.</p> <p>22 Q. And you used that for all</p> <p>23 communications?</p> <p>24 A. Yes, I did.</p>

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<p style="text-align: right;">Page 26</p> <p>1 Q. Including personal 2 communications? 3 A. I did. I know it was 4 perhaps not the best practice, but it was 5 just a reality that our lives were so 6 inextricably linked with work, and I had 7 little [REDACTED] tions. 8 [REDACTED] 9 [REDACTED] 10 [REDACTED] 11 [REDACTED] 12 [REDACTED] 13 [REDACTED] 14 [REDACTED] 15 [REDACTED] 16 [REDACTED] 17 [REDACTED] 18 [REDACTED] 19 [REDACTED] 20 [REDACTED] 21 [REDACTED] 22 [REDACTED] 23 [REDACTED] 24 [REDACTED]</p>	<p style="text-align: right;">Page 28</p> <p>1 [REDACTED] Since that time, however, I 2 [REDACTED] 3 [REDACTED] 4 [REDACTED] 5 [REDACTED] 6 [REDACTED] 7 [REDACTED] 8 [REDACTED] 9 Q. You mentioned earlier that 10 Campbell Alliance was the PMO for REMS. 11 What is PMO? 12 A. Project management office. 13 Q. What do they do for REMS? 14 A. They execute all of the 15 project -- and I should -- I should state 16 that this is my understanding as of 2016 17 when I last worked with them in that 18 formal capacity. 19 They were responsible for 20 conducting the meetings, scheduling the 21 subteam meetings, taking minutes of the 22 meetings, retaining the records for 23 the -- for the REMS. Any number of 24 operational aspects of the REMS itself,</p>
<p style="text-align: right;">Page 27</p> <p>1 [REDACTED] 2 [REDACTED] 3 [REDACTED] 4 [REDACTED] 5 [REDACTED] 6 [REDACTED] 7 [REDACTED] 8 [REDACTED] 9 [REDACTED] 10 [REDACTED] 11 [REDACTED] 12 [REDACTED] 13 [REDACTED] 14 [REDACTED] 15 [REDACTED] 16 [REDACTED] 17 [REDACTED] 18 [REDACTED] 19 [REDACTED] 20 [REDACTED] 21 [REDACTED] 22 [REDACTED] 23 [REDACTED] 24 [REDACTED]</p>	<p style="text-align: right;">Page 29</p> <p>1 since there were a group of, you know, 2 25-plus companies at that time. 3 So they served as the 4 logistical and operational arm of the 5 RPC, the REMS program companies. 6 Q. And during your consultancy 7 with Campbell Alliance, did you use your 8 Linda A. Kitlinski Gmail for 9 communications related to this work? 10 A. Yes. Again, I used my Endo 11 address for communications with Campbell 12 Alliance, because they were -- I don't 13 recall when they came on board exactly, 14 it was early on in the REMS, so I was 15 communicating with them via my Endo 16 e-mail address until I retired from Endo. 17 And then during the consulting period, I 18 worked with the Gmail address. 19 Q. And what types of 20 communications would be -- would you 21 typically send from your Gmail address 22 related to your consultancy for Campbell 23 Alliance? 24 [REDACTED]</p>

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<p style="text-align: right;">Page 30</p> <p>1 [REDACTED] 2 [REDACTED] 3 [REDACTED] 4 [REDACTED] 5 [REDACTED] 6 [REDACTED] 7 [REDACTED] 8 [REDACTED] 9 [REDACTED] 10 [REDACTED] 11 [REDACTED] 12 [REDACTED] 13 [REDACTED] 14 [REDACTED] 15 [REDACTED] 16 [REDACTED] 17 [REDACTED] 18 [REDACTED] 19 [REDACTED] 20 [REDACTED] 21 [REDACTED] 22 [REDACTED] 23 [REDACTED] 24 [REDACTED]</p>	<p style="text-align: right;">Page 32</p> <p>1 th, it's the type of documents that -- and 2 [REDACTED] 3 [REDACTED] 4 [REDACTED] 5 [REDACTED] 6 [REDACTED] 7 [REDACTED] 8 [REDACTED] 9 [REDACTED] 10 [REDACTED] 11 [REDACTED] 12 [REDACTED] 13 [REDACTED] 14 [REDACTED] 15 [REDACTED] 16 [REDACTED] 17 [REDACTED] 18 [REDACTED] 19 [REDACTED] 20 [REDACTED] 21 [REDACTED] 22 [REDACTED] 23 [REDACTED] 24 [REDACTED]</p>
<p style="text-align: right;">Page 31</p> <p>1 [REDACTED] 2 [REDACTED] 3 [REDACTED] 4 [REDACTED] 5 [REDACTED] 6 [REDACTED] 7 [REDACTED] 8 [REDACTED] 9 [REDACTED] 10 [REDACTED] 11 [REDACTED] 12 [REDACTED] 13 [REDACTED] 14 [REDACTED] 15 [REDACTED] 16 [REDACTED] 17 [REDACTED] 18 [REDACTED] 19 [REDACTED] 20 [REDACTED] 21 [REDACTED] 22 [REDACTED] 23 [REDACTED] 24 [REDACTED]</p>	<p style="text-align: right;">Page 33</p> <p>1 Q. While you were working at 2 [REDACTED] 3 [REDACTED] 4 [REDACTED] 5 [REDACTED] 6 back to, let's say, 2009. And I don't 7 know the dates here, but she did work for 8 Pfizer at one point in time. She worked 9 for Purdue. She worked for Pernix. And 10 there was one other small company, 11 Horizon Pharmaceuticals, which was not an 12 opioid company. 13 Q. Did you ever communicate 14 with individuals at ACCME? 15 A. Yes. That was a large part 16 of -- I mentioned to you the Conjoint 17 Committee on Continuing Education, that 18 working group. I perhaps should have 19 explained what that was. 20 That is an organization of 21 approximately 25 to 26 national 22 accrediting bodies, including the ACCME, 23 and including the national professional 24 organizations that accredit education for</p>

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<p>1 nurses, pharmacists, physicians, 2 dentists, et cetera. 3 So ACCME was one of the 4 accreditors with whom, you know, the CE 5 subteam at RPC communicated regularly. 6 Q. And if you were 7 communicating with an individual at 8 ACCME, that would be -- you would send an 9 e-mail from your Gmail to that individual 10 at ACCME? 11 A. I would bet that there were 12 maybe one or two e-mails, again, from my 13 Gmail address. Because all of our 14 communications with the ACCME, the vast 15 majority occurred during the context of 16 when we were developing the REMS or in a 17 meeting that Syneos and the RPC would 18 have been involved with. 19 So the -- to my knowledge, 20 there were two direct e-mails to ACCME, 21 and they were regarding participation in 22 a meeting that was coming up that we were 23 both supposed to be speaking at. So it 24 was not -- and/or, you know, coordinating</p>	<p>1 MR. DAVIS: Object to form. 2 Go ahead. 3 THE WITNESS: If it was 4 after 2016, yes. I'm sorry, if 5 was -- yes, if it was after 2016. 6 And also on occasion, in between 7 that period of time when I was 8 retired from Endo but not yet a 9 consultant for Campbell. 10 Because I left Endo in the 11 middle of May of 2014, and then my 12 consulting agreement started in, 13 like, October or so of that year. 14 BY MS. AMINOLROAYA: 15 [REDACTED] 16 [REDACTED] 17 [REDACTED] 18 [REDACTED] 19 [REDACTED] 20 [REDACTED] 21 [REDACTED] 22 [REDACTED] 23 [REDACTED] 24 [REDACTED]</p>
Page 35	Page 37
<p>1 participation in a conference, like at 2 the FDA public meeting type things. 3 Q. Did you ever communicate 4 with individuals from the Council of 5 Medical Specialty Societies? 6 A. Yes. Dr. Kahn, Norm Kahn 7 and Heidi Lapka are the -- Dr. Kahn is 8 the head of the Council of Medical 9 Professional Societies. Heidi Lapka is 10 the executive director. And they were 11 the organization that was the convener 12 for the Conjoint Committee on Continuing 13 Education that I referred to a little 14 while ago. 15 And to just put that in 16 perspective, the CMSS, the Council of 17 Medical Specialty Societies, represents 18 650, 750 clinicians from across the U.S. 19 in all medical specialties. 20 Q. And when you would 21 communicate with individuals from CMSS, 22 you would do this using your Gmail 23 account? 24 A. If it was --</p>	<p>1 [REDACTED] 2 [REDACTED] 3 [REDACTED] 4 [REDACTED] 5 [REDACTED] 6 [REDACTED] 7 [REDACTED] 8 [REDACTED] 9 [REDACTED] 10 [REDACTED] 11 [REDACTED] 12 [REDACTED] 13 [REDACTED] 14 [REDACTED] 15 [REDACTED] 16 [REDACTED] 17 [REDACTED] 18 [REDACTED] 19 [REDACTED] 20 [REDACTED] 21 [REDACTED] 22 [REDACTED] 23 [REDACTED] 24 [REDACTED]</p>

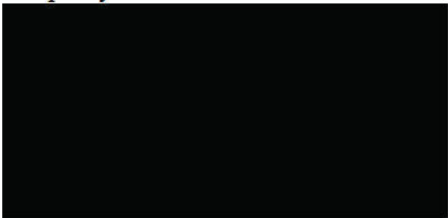
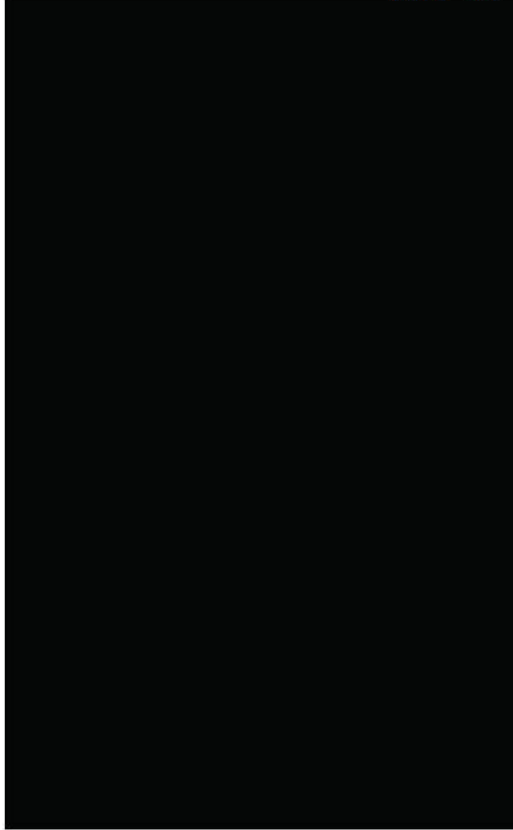
10 (Pages 34 to 37)

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<p style="text-align: right;">Page 38</p> <p>1 [REDACTED] 2 [REDACTED] 3 [REDACTED] 4 [REDACTED] 5 [REDACTED] 6 [REDACTED] 7 [REDACTED] 8 [REDACTED] 9 [REDACTED] 10 [REDACTED] 11 [REDACTED] 12 [REDACTED] 13 [REDACTED] 14 [REDACTED] 15 [REDACTED] 16 [REDACTED] 17 [REDACTED] 18 [REDACTED] 19 [REDACTED] 20 [REDACTED] 21 [REDACTED] 22 [REDACTED] 23 [REDACTED] 24 [REDACTED]</p>	<p style="text-align: right;">Page 40</p> <p>1 Pennsylvania, a small town in 2 Northeastern PA, and graduated from Penn 3 State University in 1977, with a degree 4 in business administration. 5 I'm proud to say I 6 maintained my dean's list average that 7 whole time and attended there on a 8 scholarship. 9 I stayed in the local area 10 subsequent to my graduation for about 11 three years, due to family medical 12 situations. 13 Q. And what did you do after 14 you graduated from Penn State? 15 A. I worked, as I said, in the 16 local area there. My mom was ill, so I 17 worked as a manager for a local retail 18 department store. 19 Q. And how long did you do 20 that? 21 A. For three years. 22 Q. And what did you do after 23 that? 24 A. I relocated to Harrisburg in</p>
<p style="text-align: right;">Page 39</p> <p>1 [REDACTED] rt 2 [REDACTED] 3 [REDACTED] 4 [REDACTED] 5 [REDACTED] 6 [REDACTED] 7 [REDACTED] 8 [REDACTED] 9 [REDACTED] 10 [REDACTED] 11 [REDACTED] 12 [REDACTED] 13 [REDACTED] 14 you review any 15 deposition transcripts in preparation for 16 your testimony today? 17 A. I did not. 18 Q. I believe you answered this 19 earlier, have you ever been deposed 20 before? 21 A. No, I have not. 22 Q. Tell us about your 23 education, Ms. Kitlinski. 24 A. I grew up in Hazleton,</p>	<p style="text-align: right;">Page 41</p> <p>1 1980. 2 During the time of helping 3 my mom to navigate through her condition, 4 I became really interested in 5 pharmaceuticals, and education in 6 particular. My mom's godchild was a 7 pharmacist, training at Duquesne. She 8 stayed with us during the summers, and 9 she had a very positive influence on me. 10 And then again, seeing the 11 turnaround in my mom, once she was able 12 to be treated adequately, I was really -- 13 my interest was piqued by 14 pharmaceuticals. 15 So where I lived, there were 16 no pharmaceutical companies nor 17 opportunities for really advancing in 18 that area. So I relocated to Harrisburg, 19 which was close enough to be available 20 for Mom if she needed me, but yet a 21 little bit of an area for better 22 opportunities. 23 I worked first for Marriott 24 and then Kaiser Roth as I was</p>

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<p style="text-align: right;">Page 42</p> <p>1 identifying, through an employment 2 agency, an opportunity to get into 3 pharmaceuticals. 4 I joined Schering 5 Pharmaceuticals ophthalmic division, and 6 that was in 1984. And I stayed with 7 Schering until 1986, when I joined DuPont 8 Pharmaceuticals, which was the parent 9 company for Endo. 10 Q. And what did you do at 11 Schering? 12 A. At Schering, I was the 13 regional representative for their contact 14 lenses and ophthalmic solutions. 15 Q. Is that a sales -- a sales 16 position? 17 A. It was sales related, yes. 18 Q. And what did you do as a 19 regional representative for Schering? 20 A. I would be in touch with the 21 ophthalmologists and the optometrists in 22 the area. Wesley-Jessen was the research 23 arm of the company that had developed the 24 first soft contact lenses. And so my job</p>	<p style="text-align: right;">Page 44</p> <p>1 clinical liaison. Over the course of the 2 years they called them different things, 3 clinical liaisons, medical science 4 liaisons, basically, field-based medical 5 people. 6 I served as a senior 7 clinical liaison and then manager of the 8 clinical liaisons during my time there at 9 DuPont. 10 In 1980, DuPont entered into 11 a joint venture with Merck 12 Pharmaceuticals. And so the company name 13 changed from DuPont Pharma to DuPont 14 Merck Pharmaceuticals. 15 And at DuPont Merck, my 16 responsibilities were an associate 17 director -- in an associate director 18 capacity there. 19  20 21 22 23 24</p>
<p style="text-align: right;">Page 43</p> <p>1 was to explain the different types of 2 contact lenses and ophthalmic solutions 3 that were available to optometrists and 4 ophthalmologists. 5 Q. And was your compensation 6 related -- did you receive -- 7 A. A salary. It was a salaried 8 position. 9 Q. Thank you. 10 Did you receive any 11 incentive compensation? 12 A. You know, it was a really 13 long time ago, and I don't recall. 14 Q. And then in 1986 you went to 15 DuPont; is that correct? 16 A. Let's see. 17 Yes, 1986, I went to DuPont. 18 And the -- as I said, that was the parent 19 company for Endo. 20 While I was at DuPont, I 21 served in various capacities. I was 22 there from '86 until '97. And so I 23 served in the capacity as a regional 24 trainer. I served in the capacity as a</p>	<p style="text-align: right;">Page 45</p> <p>1  2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23 24</p>

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<p>Page 47</p> <p>1 [REDACTED]</p> <p>2 [REDACTED]</p> <p>3 [REDACTED]</p> <p>4 [REDACTED]</p> <p>5 [REDACTED]</p> <p>6 [REDACTED]</p> <p>7 [REDACTED]</p> <p>8 [REDACTED]</p> <p>9 [REDACTED]</p> <p>10 [REDACTED]</p> <p>11 [REDACTED]</p> <p>12 [REDACTED]</p> <p>13 [REDACTED]</p> <p>14 [REDACTED]</p> <p>15 [REDACTED]</p> <p>16 [REDACTED]</p> <p>17 [REDACTED]</p> <p>18 [REDACTED]</p> <p>19 [REDACTED]</p> <p>20 [REDACTED]</p> <p>21 [REDACTED]</p> <p>22 [REDACTED]</p> <p>23 [REDACTED]</p> <p>24 [REDACTED]</p>	<p>Page 49</p> <p>1 [REDACTED]</p> <p>2 [REDACTED]</p> <p>3 [REDACTED]</p> <p>4 [REDACTED]</p> <p>5 [REDACTED]</p> <p>6 [REDACTED]</p> <p>7 [REDACTED]</p> <p>8 [REDACTED]</p> <p>9 [REDACTED]</p> <p>10 [REDACTED]</p> <p>11 [REDACTED]</p> <p>12 [REDACTED]</p> <p>13 [REDACTED]</p> <p>14 [REDACTED]</p> <p>15 [REDACTED]</p> <p>16 [REDACTED]</p> <p>17 [REDACTED]</p> <p>18 [REDACTED]</p> <p>19 [REDACTED]</p> <p>20 [REDACTED]</p> <p>21 [REDACTED]</p> <p>22 [REDACTED]</p> <p>23 [REDACTED]</p> <p>24 [REDACTED]</p>

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<p>Page 51</p> <p>1 [REDACTED]</p> <p>2 [REDACTED]</p> <p>3 [REDACTED]</p> <p>4 [REDACTED]</p> <p>5 [REDACTED]</p> <p>6 [REDACTED]</p> <p>7 [REDACTED]</p> <p>8 [REDACTED]</p> <p>9 [REDACTED]</p> <p>10 [REDACTED]</p> <p>11 [REDACTED]</p> <p>12 [REDACTED]</p> <p>13 [REDACTED]</p> <p>14 [REDACTED]</p> <p>15 [REDACTED]</p> <p>16 [REDACTED]</p> <p>17 [REDACTED]</p> <p>18 [REDACTED]</p> <p>19 [REDACTED]</p> <p>20 [REDACTED]</p> <p>21 [REDACTED]</p> <p>22 [REDACTED]</p> <p>23 [REDACTED]</p> <p>24 [REDACTED]</p>	<p>Page 53</p> <p>1 [REDACTED]</p> <p>2 [REDACTED]</p> <p>3 [REDACTED]</p> <p>4 [REDACTED]</p> <p>5 [REDACTED]</p> <p>6 [REDACTED]</p> <p>7 [REDACTED]</p> <p>8 [REDACTED]</p> <p>9 [REDACTED]</p> <p>10 [REDACTED]</p> <p>11 [REDACTED]</p> <p>12 [REDACTED]</p> <p>13 [REDACTED]</p> <p>14 [REDACTED]</p> <p>15 [REDACTED]</p> <p>16 [REDACTED]</p> <p>17 [REDACTED]</p> <p>18 [REDACTED]</p> <p>19 [REDACTED]</p> <p>20 [REDACTED]</p> <p>21 [REDACTED]</p> <p>22 [REDACTED]</p> <p>23 [REDACTED]</p> <p>24 [REDACTED]</p>

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<p>Page 54</p> <p>1 [REDACTED]</p> <p>2 [REDACTED]</p> <p>3 [REDACTED]</p> <p>4 [REDACTED]</p> <p>5 [REDACTED]</p> <p>6 [REDACTED]</p> <p>7 [REDACTED]</p> <p>8 [REDACTED]</p> <p>9 [REDACTED]</p> <p>10 [REDACTED]</p> <p>11 [REDACTED]</p> <p>12 [REDACTED]</p> <p>13 [REDACTED]</p> <p>14 [REDACTED]</p> <p>15 [REDACTED]</p> <p>16 [REDACTED]</p> <p>17 [REDACTED]</p> <p>18 [REDACTED]</p> <p>19 [REDACTED]</p> <p>20 [REDACTED]</p> <p>21 [REDACTED]</p> <p>22 [REDACTED]</p> <p>23 [REDACTED]</p> <p>24 [REDACTED]</p>	<p>Page 56</p> <p>1 [REDACTED]</p> <p>2 [REDACTED]</p> <p>3 [REDACTED]</p> <p>4 [REDACTED]</p> <p>5 [REDACTED]</p> <p>6 [REDACTED]</p> <p>7 [REDACTED]</p> <p>8 [REDACTED]</p> <p>9 [REDACTED]</p> <p>10 [REDACTED]</p> <p>11 [REDACTED]</p> <p>12 [REDACTED]</p> <p>13 [REDACTED]</p> <p>14 [REDACTED]</p> <p>15 [REDACTED]</p> <p>16 [REDACTED]</p> <p>17 [REDACTED]</p> <p>18 [REDACTED]</p> <p>19 [REDACTED]</p> <p>20 [REDACTED]</p> <p>21 [REDACTED]</p> <p>22 [REDACTED]</p> <p>23 [REDACTED]</p> <p>24 [REDACTED]</p>
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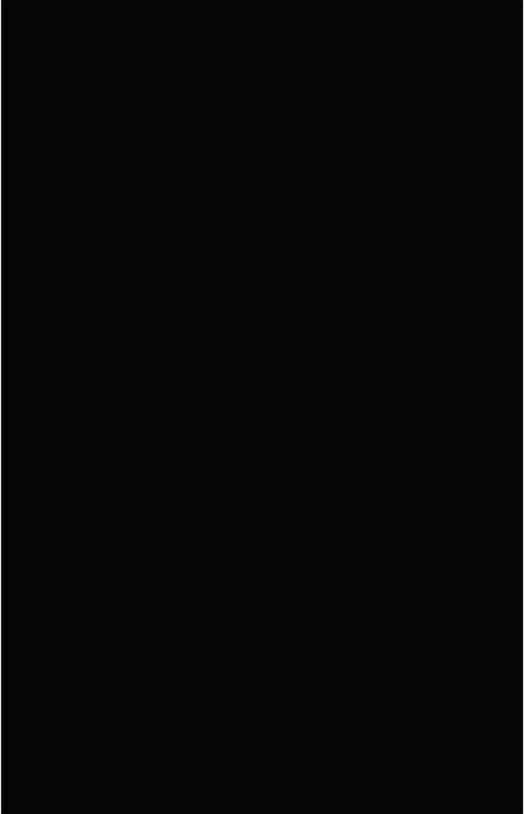
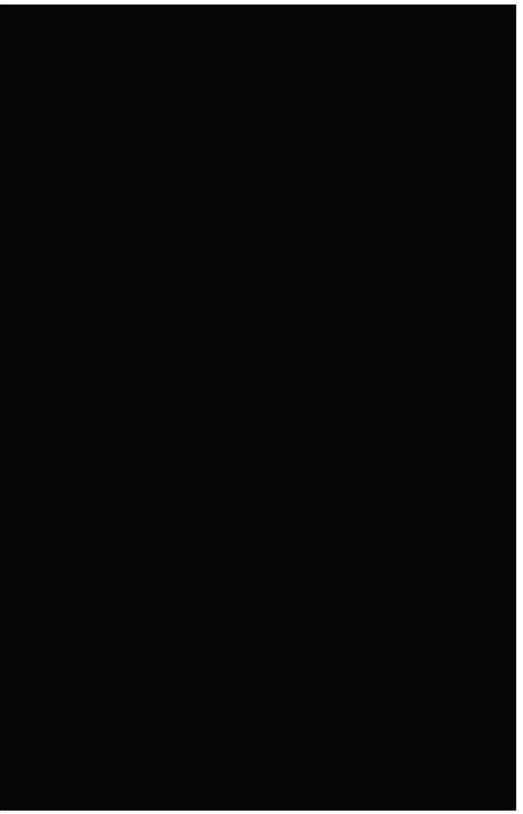
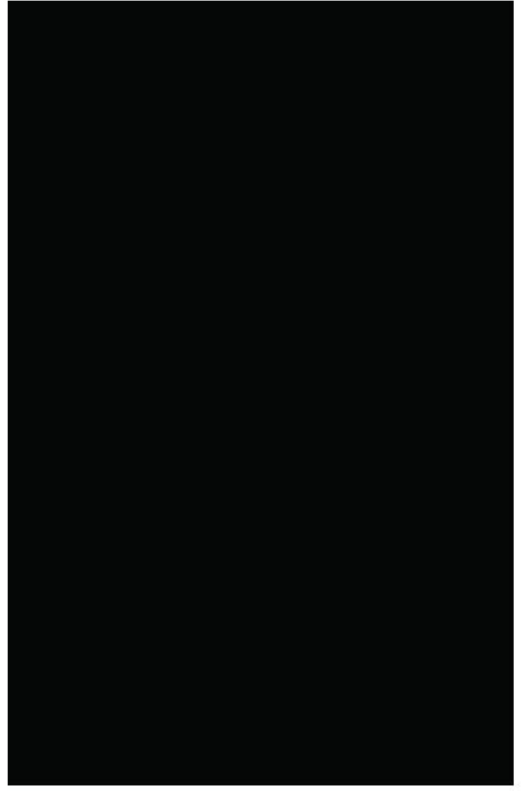
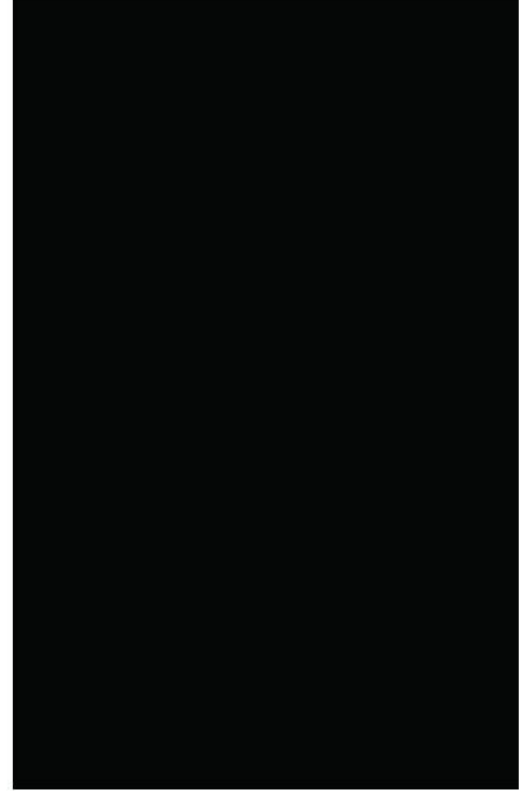
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<p>Page 58</p> <p>1 [REDACTED]</p> <p>2 [REDACTED]</p> <p>3 [REDACTED]</p> <p>4 [REDACTED]</p> <p>5 [REDACTED]</p> <p>6 [REDACTED]</p> <p>7 [REDACTED]</p> <p>8 [REDACTED]</p> <p>9 [REDACTED]</p> <p>10 [REDACTED]</p> <p>11 [REDACTED]</p> <p>12 [REDACTED]</p> <p>13 [REDACTED]</p> <p>14 [REDACTED]</p> <p>15 [REDACTED]</p> <p>16 [REDACTED]</p> <p>17 [REDACTED]</p> <p>18 [REDACTED]</p> <p>19 [REDACTED]</p> <p>20 [REDACTED]</p> <p>21 [REDACTED]</p> <p>22 [REDACTED]</p> <p>23 [REDACTED]</p> <p>24 [REDACTED]</p>	<p>Page 60</p> <p>1 [REDACTED]</p> <p>2 [REDACTED]</p> <p>3 [REDACTED]</p> <p>4 [REDACTED]</p> <p>5 [REDACTED]</p> <p>6 [REDACTED]</p> <p>7 [REDACTED]</p> <p>8 [REDACTED]</p> <p>9 [REDACTED]</p> <p>10 [REDACTED]</p> <p>11 [REDACTED]</p> <p>12 [REDACTED]</p> <p>13 [REDACTED]</p> <p>14 [REDACTED]</p> <p>15 [REDACTED]</p> <p>16 [REDACTED]</p> <p>17 [REDACTED]</p> <p>18 [REDACTED]</p> <p>19 [REDACTED]</p> <p>20 [REDACTED]</p> <p>21 [REDACTED]</p> <p>22 [REDACTED]</p> <p>23 [REDACTED]</p> <p>24 [REDACTED]</p>
<p>Page 59</p> <p>1 [REDACTED]</p> <p>2 [REDACTED]</p> <p>3 [REDACTED]</p> <p>4 [REDACTED]</p> <p>5 [REDACTED]</p> <p>6 [REDACTED]</p> <p>7 [REDACTED]</p> <p>8 [REDACTED]</p> <p>9 [REDACTED]</p> <p>10 [REDACTED]</p> <p>11 [REDACTED]</p> <p>12 [REDACTED]</p> <p>13 [REDACTED]</p> <p>14 [REDACTED]</p> <p>15 [REDACTED]</p> <p>16 [REDACTED]</p> <p>17 [REDACTED]</p> <p>18 [REDACTED]</p> <p>19 [REDACTED]</p> <p>20 [REDACTED]</p> <p>21 [REDACTED]</p> <p>22 [REDACTED]</p> <p>23 [REDACTED]</p> <p>24 [REDACTED]</p>	<p>Page 61</p> <p>1 [REDACTED]</p> <p>2 [REDACTED]</p> <p>3 [REDACTED]</p> <p>4 [REDACTED]</p> <p>5 [REDACTED]</p> <p>6 [REDACTED]</p> <p>7 [REDACTED]</p> <p>8 [REDACTED]</p> <p>9 [REDACTED]</p> <p>10 [REDACTED]</p> <p>11 [REDACTED]</p> <p>12 [REDACTED]</p> <p>13 [REDACTED]</p> <p>14 [REDACTED]</p> <p>15 [REDACTED]</p> <p>16 [REDACTED]</p> <p>17 [REDACTED]</p> <p>18 [REDACTED]</p> <p>19 [REDACTED]</p> <p>20 [REDACTED]</p> <p>21 [REDACTED]</p> <p>22 [REDACTED]</p> <p>23 [REDACTED]</p> <p>24 [REDACTED]</p>

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<p>Page 62</p> <p>1 2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23 24</p> 	<p>Page 64</p> <p>1 2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23 24</p> 
<p>Page 63</p> <p>1 2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23 24</p> 	<p>Page 65</p> <p>1 2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23 24</p> 

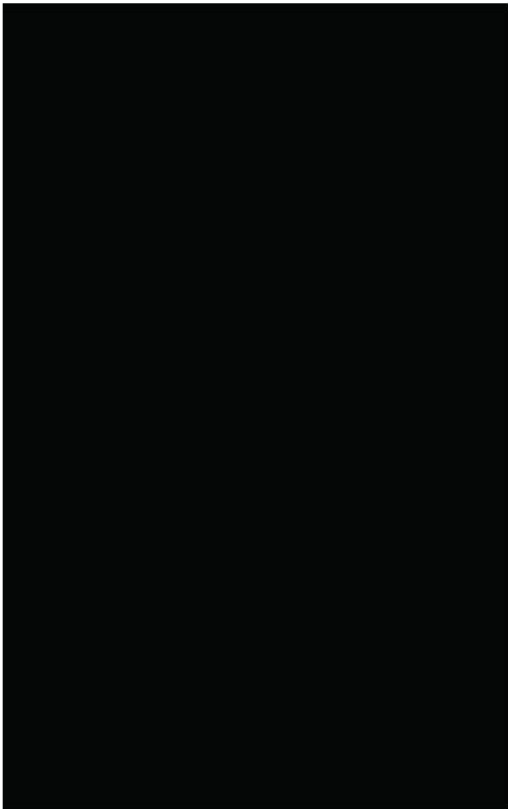
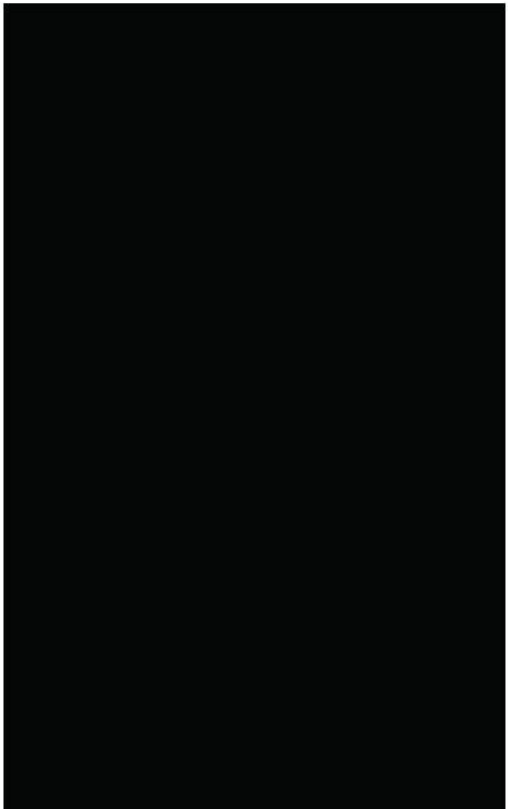
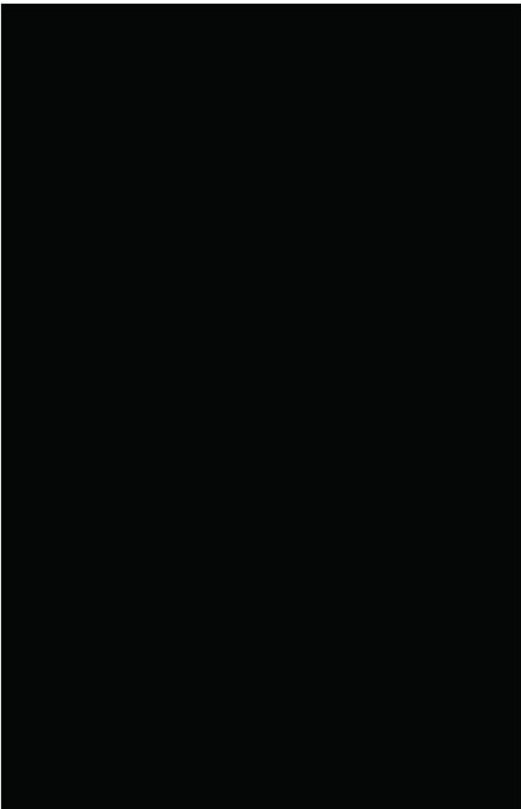
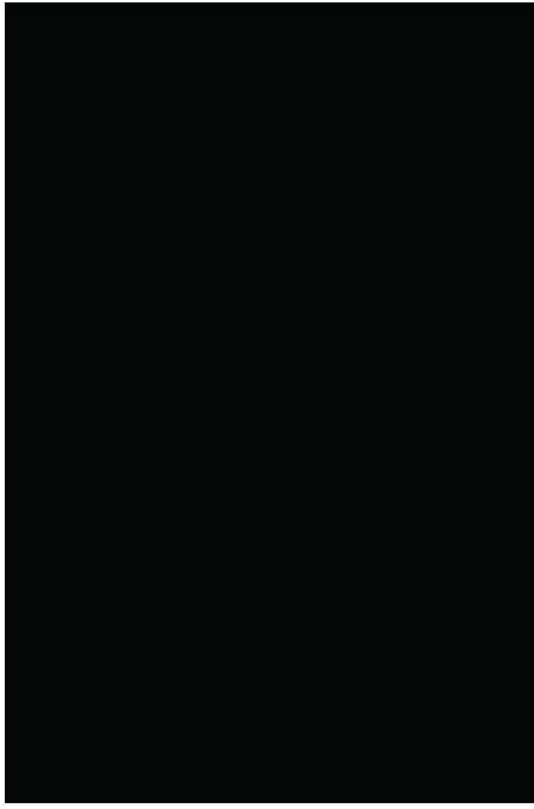
17 (Pages 62 to 65)

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<p style="text-align: right;">Page 67</p> <p>1 MR. DAVIS: Parvin, it's 2 been about an hour. I don't know 3 if you want to go into that one or 4 take a break now. I don't know 5 how much you have. 6 MS. AMINOLROAYA: No, that's 7 fine. Let's take a break. 8 VIDEO TECHNICIAN: Going off 9 the record. The time is 10:07 10 a m. 11 - - - 12 (Whereupon, a brief recess 13 was taken.) 14 - - - 15 VIDEO TECHNICIAN: We are 16 back on the record. The time is 17 10:20 a.m. 18 BY MS. AMINOLROAYA: 19 Q. Welcome back, Ms. Kitlinski. 20 We just took a short break. We're back 21 on the record. 22 I'm going to hand you what's 23 being marked as Exhibit-2. 24 - - -</p>	<p style="text-align: right;">Page 69</p> <p>1 [REDACTED] 2 [REDACTED] 3 [REDACTED] 4 [REDACTED] 5 [REDACTED] 6 [REDACTED] 7 [REDACTED] 8 [REDACTED] 9 [REDACTED] 10 [REDACTED] 11 [REDACTED] 12 [REDACTED] 13 [REDACTED] 14 [REDACTED] 15 [REDACTED] 16 [REDACTED] 17 [REDACTED] 18 [REDACTED] 19 [REDACTED] 20 [REDACTED] 21 [REDACTED] 22 [REDACTED] 23 [REDACTED] 24 [REDACTED]</p>

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<p>Page 70</p> <p>1 2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23 24</p> 	<p>Page 72</p> <p>1 2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23 24</p> 
<p>Page 71</p> <p>1 2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23 24</p> 	<p>Page 73</p> <p>1 2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23 24</p> 

19 (Pages 70 to 73)

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<p>Page 74</p> <p>1 [REDACTED]</p> <p>2 [REDACTED]</p> <p>3 [REDACTED]</p> <p>4 [REDACTED]</p> <p>5 [REDACTED]</p> <p>6 [REDACTED]</p> <p>7 [REDACTED]</p> <p>8 [REDACTED]</p> <p>9 [REDACTED]</p> <p>10 [REDACTED]</p> <p>11 [REDACTED]</p> <p>12 [REDACTED]</p> <p>13 [REDACTED]</p> <p>14 [REDACTED]</p> <p>15 [REDACTED]</p> <p>16 [REDACTED]</p> <p>17 [REDACTED]</p> <p>18 [REDACTED]</p> <p>19 [REDACTED]</p> <p>20 [REDACTED]</p> <p>21 [REDACTED]</p> <p>22 [REDACTED]</p> <p>23 [REDACTED]</p> <p>24 [REDACTED]</p>	<p>Page 76</p> <p>1 [REDACTED]</p> <p>2 [REDACTED]</p> <p>3 [REDACTED]</p> <p>4 [REDACTED]</p> <p>5 [REDACTED]</p> <p>6 [REDACTED]</p> <p>7 [REDACTED]</p> <p>8 [REDACTED]</p> <p>9 [REDACTED]</p> <p>10 [REDACTED]</p> <p>11 [REDACTED]</p> <p>12 [REDACTED]</p> <p>13 [REDACTED]</p> <p>14 [REDACTED]</p> <p>15 [REDACTED]</p> <p>16 [REDACTED]</p> <p>17 [REDACTED]</p> <p>18 [REDACTED]</p> <p>19 [REDACTED]</p> <p>20 [REDACTED]</p> <p>21 [REDACTED]</p> <p>22 [REDACTED]</p> <p>23 [REDACTED]</p> <p>24 [REDACTED]</p>
<p>Page 75</p> <p>1 [REDACTED]</p> <p>2 [REDACTED]</p> <p>3 [REDACTED]</p> <p>4 [REDACTED]</p> <p>5 [REDACTED]</p> <p>6 [REDACTED]</p> <p>7 [REDACTED]</p> <p>8 [REDACTED]</p> <p>9 [REDACTED]</p> <p>10 [REDACTED]</p> <p>11 [REDACTED]</p> <p>12 [REDACTED]</p> <p>13 [REDACTED]</p> <p>14 [REDACTED]</p> <p>15 [REDACTED]</p> <p>16 [REDACTED]</p> <p>17 [REDACTED]</p> <p>18 [REDACTED]</p> <p>19 [REDACTED]</p> <p>20 [REDACTED]</p> <p>21 [REDACTED]</p> <p>22 [REDACTED]</p> <p>23 [REDACTED]</p> <p>24 [REDACTED]</p>	<p>Page 77</p> <p>1 [REDACTED]</p> <p>2 [REDACTED]</p> <p>3 [REDACTED]</p> <p>4 [REDACTED]</p> <p>5 [REDACTED]</p> <p>6 [REDACTED]</p> <p>7 [REDACTED]</p> <p>8 [REDACTED]</p> <p>9 [REDACTED]</p> <p>10 [REDACTED]</p> <p>11 [REDACTED]</p> <p>12 [REDACTED]</p> <p>13 [REDACTED]</p> <p>14 [REDACTED]</p> <p>15 [REDACTED]</p> <p>16 [REDACTED]</p> <p>17 [REDACTED]</p> <p>18 [REDACTED]</p> <p>19 [REDACTED]</p> <p>20 [REDACTED]</p> <p>21 [REDACTED]</p> <p>22 [REDACTED]</p> <p>23 [REDACTED]</p> <p>24 [REDACTED]</p>

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<p>Page 78</p> <p>1 [REDACTED]</p> <p>2 [REDACTED]</p> <p>3 [REDACTED]</p> <p>4 [REDACTED]</p> <p>5 [REDACTED]</p> <p>6 [REDACTED]</p> <p>7 [REDACTED]</p> <p>8 [REDACTED]</p> <p>9 [REDACTED]</p> <p>10 [REDACTED]</p> <p>11 [REDACTED]</p> <p>12 [REDACTED]</p> <p>13 [REDACTED]</p> <p>14 [REDACTED]</p> <p>15 [REDACTED]</p> <p>16 [REDACTED]</p> <p>17 [REDACTED]</p> <p>18 [REDACTED]</p> <p>19 [REDACTED]</p> <p>20 [REDACTED]</p> <p>21 [REDACTED]</p> <p>22 [REDACTED]</p> <p>23 [REDACTED]</p> <p>24 [REDACTED]</p>	<p>Page 80</p> <p>1 [REDACTED]</p> <p>2 [REDACTED]</p> <p>3 [REDACTED]</p> <p>4 [REDACTED]</p> <p>5 [REDACTED]</p> <p>6 [REDACTED]</p> <p>7 [REDACTED]</p> <p>8 [REDACTED]</p> <p>9 [REDACTED]</p> <p>10 [REDACTED]</p> <p>11 [REDACTED]</p> <p>12 [REDACTED]</p> <p>13 [REDACTED]</p> <p>14 [REDACTED]</p> <p>15 [REDACTED]</p> <p>16 [REDACTED]</p> <p>17 [REDACTED]</p> <p>18 [REDACTED]</p> <p>19 [REDACTED]</p> <p>20 [REDACTED]</p> <p>21 [REDACTED]</p> <p>22 [REDACTED]</p> <p>23 [REDACTED]</p> <p>24 [REDACTED]</p>
<p>Page 79</p> <p>1 [REDACTED]</p> <p>2 [REDACTED]</p> <p>3 [REDACTED]</p> <p>4 [REDACTED]</p> <p>5 [REDACTED]</p> <p>6 [REDACTED]</p> <p>7 [REDACTED]</p> <p>8 [REDACTED]</p> <p>9 [REDACTED]</p> <p>10 [REDACTED]</p> <p>11 [REDACTED]</p> <p>12 [REDACTED]</p> <p>13 [REDACTED]</p> <p>14 [REDACTED]</p> <p>15 [REDACTED]</p> <p>16 [REDACTED]</p> <p>17 [REDACTED]</p> <p>18 [REDACTED]</p> <p>19 [REDACTED]</p> <p>20 [REDACTED]</p> <p>21 [REDACTED]</p> <p>22 [REDACTED]</p> <p>23 [REDACTED]</p> <p>24 [REDACTED]</p>	<p>Page 81</p> <p>1 [REDACTED]</p> <p>2 [REDACTED]</p> <p>3 [REDACTED]</p> <p>4 [REDACTED]</p> <p>5 [REDACTED]</p> <p>6 [REDACTED]</p> <p>7 [REDACTED]</p> <p>8 [REDACTED]</p> <p>9 [REDACTED]</p> <p>10 [REDACTED]</p> <p>11 [REDACTED]</p> <p>12 [REDACTED]</p> <p>13 [REDACTED]</p> <p>14 [REDACTED]</p> <p>15 [REDACTED]</p> <p>16 [REDACTED]</p> <p>17 [REDACTED]</p> <p>18 [REDACTED]</p> <p>19 THE WITNESS: Excuse me, is</p> <p>20 there a box of tissues nearby</p> <p>21 anywhere?</p> <p>22 - - -</p> <p>23 (Whereupon, a discussion off</p> <p>24 the record occurred.)</p>

21 (Pages 78 to 81)

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<p>Page 82</p> <p>1 - - -</p> <p>2</p> <p>3</p> <p>4</p> <p>5</p> <p>6</p> <p>7</p> <p>8</p> <p>9</p> <p>10</p> <p>11</p> <p>12</p> <p>13</p> <p>14</p> <p>15</p> <p>16</p> <p>17</p> <p>18</p> <p>19</p> <p>20</p> <p>21</p> <p>22</p> <p>23</p> <p>24</p>	<p>Page 84</p> <p>1</p> <p>2</p> <p>3</p> <p>4</p> <p>5</p> <p>6</p> <p>7</p> <p>8</p> <p>9</p> <p>10</p> <p>11</p> <p>12</p> <p>13</p> <p>14</p> <p>15</p> <p>16</p> <p>17</p> <p>18</p> <p>19</p> <p>20</p> <p>21</p> <p>22</p> <p>23</p> <p>24</p>
<p>Page 83</p> <p>1</p> <p>2</p> <p>3</p> <p>4</p> <p>5</p> <p>6</p> <p>7</p> <p>8</p> <p>9</p> <p>10</p> <p>11</p> <p>12</p> <p>13</p> <p>14</p> <p>15</p> <p>16</p> <p>17</p> <p>18</p> <p>19</p> <p>20</p> <p>21</p> <p>22</p> <p>23</p> <p>24</p>	<p>Page 85</p> <p>1</p> <p>2</p> <p>3</p> <p>4</p> <p>5</p> <p>6</p> <p>7</p> <p>8</p> <p>9</p> <p>10</p> <p>11</p> <p>12</p> <p>13</p> <p>14</p> <p>15</p> <p>16</p> <p>17</p> <p>18</p> <p>19</p> <p>20</p> <p>21</p> <p>22</p> <p>23</p> <p>24</p>

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<p>Page 86</p> <p>1 [REDACTED]</p> <p>2 [REDACTED]</p> <p>3 [REDACTED]</p> <p>4 [REDACTED]</p> <p>5 [REDACTED]</p> <p>6 [REDACTED]</p> <p>7 [REDACTED]</p> <p>8 [REDACTED]</p> <p>9 [REDACTED]</p> <p>10 [REDACTED]</p> <p>11 [REDACTED]</p> <p>12 [REDACTED]</p> <p>13 [REDACTED]</p> <p>14 [REDACTED]</p> <p>15 [REDACTED]</p> <p>16 [REDACTED]</p> <p>17 [REDACTED]</p> <p>18 [REDACTED]</p> <p>19 [REDACTED]</p> <p>20 [REDACTED]</p> <p>21 [REDACTED]</p> <p>22 [REDACTED]</p> <p>23 [REDACTED]</p> <p>24 [REDACTED]</p>	<p>Page 88</p> <p>1 [REDACTED]</p> <p>2 [REDACTED]</p> <p>3 [REDACTED]</p> <p>4 [REDACTED]</p> <p>5 [REDACTED]</p> <p>6 [REDACTED]</p> <p>7 [REDACTED]</p> <p>8 [REDACTED]</p> <p>9 [REDACTED]</p> <p>10 [REDACTED]</p> <p>11 [REDACTED]</p> <p>12 [REDACTED]</p> <p>13 [REDACTED]</p> <p>14 [REDACTED]</p> <p>15 [REDACTED]</p> <p>16 [REDACTED]</p> <p>17 [REDACTED]</p> <p>18 [REDACTED]</p> <p>19 [REDACTED]</p> <p>20 [REDACTED]</p> <p>21 [REDACTED]</p> <p>22 [REDACTED]</p> <p>23 [REDACTED]</p> <p>24 [REDACTED]</p>
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<p>Page 98</p> <p>1 [REDACTED]</p> <p>2 [REDACTED]</p> <p>3 [REDACTED]</p> <p>4 [REDACTED]</p> <p>5 [REDACTED]</p> <p>6 [REDACTED]</p> <p>7 [REDACTED]</p> <p>8 [REDACTED]</p> <p>9 [REDACTED]</p> <p>10 [REDACTED]</p> <p>11 [REDACTED]</p> <p>12 [REDACTED]</p> <p>13 [REDACTED]</p> <p>14 [REDACTED]</p> <p>15 [REDACTED]</p> <p>16 [REDACTED]</p> <p>17 [REDACTED]</p> <p>18 [REDACTED]</p> <p>19 [REDACTED]</p> <p>20 [REDACTED]</p> <p>21 [REDACTED]</p> <p>22 [REDACTED]</p> <p>23 [REDACTED]</p> <p>24 [REDACTED]</p>	<p>Page 100</p> <p>1 [REDACTED]</p> <p>2 [REDACTED]</p> <p>3 [REDACTED]</p> <p>4 [REDACTED]</p> <p>5 [REDACTED]</p> <p>6 [REDACTED]</p> <p>7 [REDACTED]</p> <p>8 [REDACTED]</p> <p>9 [REDACTED]</p> <p>10 [REDACTED]</p> <p>11 [REDACTED]</p> <p>12 [REDACTED]</p> <p>13 [REDACTED]</p> <p>14 [REDACTED]</p> <p>15 [REDACTED]</p> <p>16 [REDACTED]</p> <p>17 [REDACTED]</p> <p>18 [REDACTED]</p> <p>19 [REDACTED]</p> <p>20 [REDACTED]</p> <p>21 [REDACTED]</p> <p>22 [REDACTED]</p> <p>23 [REDACTED]</p> <p>24 [REDACTED]</p>
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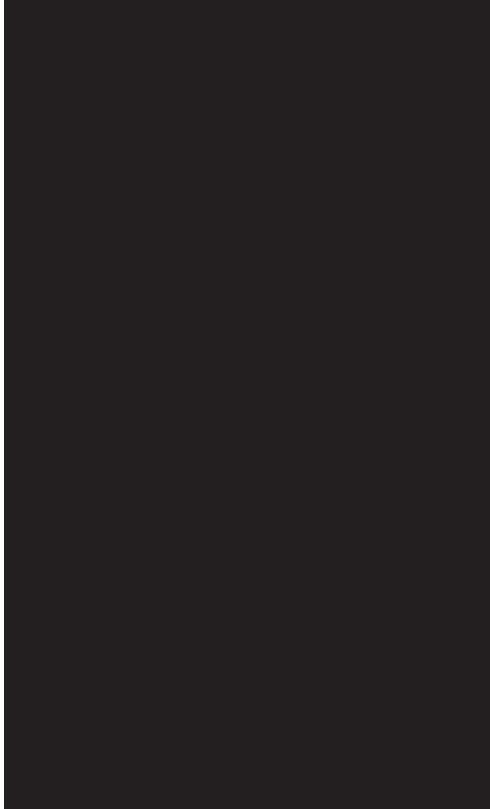

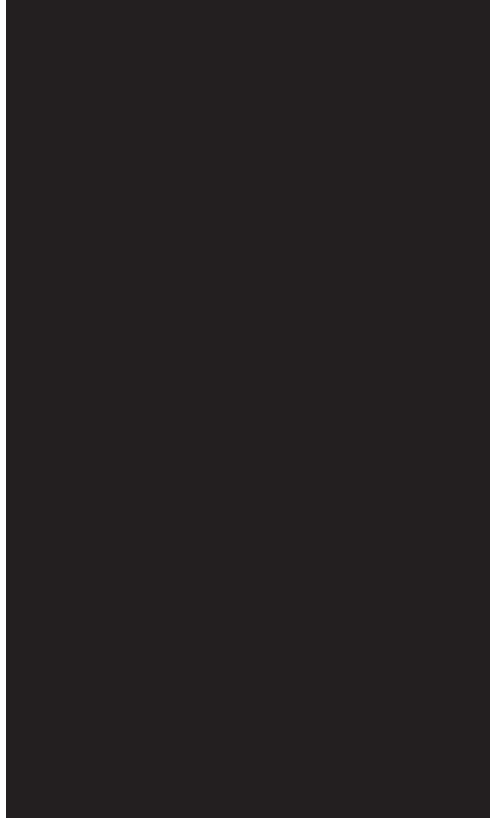
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<p>Page 102</p> <p>1 [REDACTED] 2 [REDACTED] 3 [REDACTED] 4 [REDACTED] 5 [REDACTED] 6 [REDACTED] 7 [REDACTED] 8 [REDACTED] 9 [REDACTED] 10 [REDACTED] 11 [REDACTED] 12 [REDACTED] 13 [REDACTED] 14 [REDACTED] 15 [REDACTED] 16 [REDACTED] 17 [REDACTED] 18 [REDACTED] 19 [REDACTED] 20 [REDACTED] 21 [REDACTED] 22 [REDACTED] 23 [REDACTED] 24 [REDACTED]</p>	<p>Page 104</p> <p>1 [REDACTED] 2 [REDACTED] 3 [REDACTED] 4 [REDACTED] 5 [REDACTED] 6 [REDACTED] 7 [REDACTED] 8 [REDACTED] 9 [REDACTED] 10 [REDACTED] 11 [REDACTED] 12 [REDACTED] 13 [REDACTED] 14 [REDACTED] 15 [REDACTED] 16 [REDACTED] 17 [REDACTED] 18 [REDACTED] 19 [REDACTED] 20 [REDACTED] 21 [REDACTED] 22 [REDACTED] 23 [REDACTED] 24 [REDACTED]</p>
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<p>Page 106</p> <p>1 2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23 24</p> 	<p>Page 108</p> <p>1 2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23 24</p> 
<p>Page 107</p> <p>1 2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23 24</p> 	<p>Page 109</p> <p>1 2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23 24</p> 

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<p>Page 111</p> <p>1 [REDACTED]</p> <p>2 [REDACTED]</p> <p>3 [REDACTED]</p> <p>4 [REDACTED]</p> <p>5 [REDACTED]</p> <p>6 [REDACTED]</p> <p>7 [REDACTED]</p> <p>8 [REDACTED]</p> <p>9 [REDACTED]</p> <p>10 [REDACTED]</p> <p>11 [REDACTED]</p> <p>12 [REDACTED]</p> <p>13 [REDACTED]</p> <p>14 [REDACTED]</p> <p>15 [REDACTED]</p> <p>16 [REDACTED]</p> <p>17 [REDACTED]</p> <p>18 [REDACTED]</p> <p>19 [REDACTED]</p> <p>20 [REDACTED]</p> <p>21 [REDACTED]</p> <p>22 [REDACTED]</p> <p>23 [REDACTED]</p> <p>24 [REDACTED]</p>	<p>Page 113</p> <p>1 [REDACTED]</p> <p>2 [REDACTED]</p> <p>3 [REDACTED]</p> <p>4 [REDACTED]</p> <p>5 [REDACTED]</p> <p>6 [REDACTED]</p> <p>7 [REDACTED]</p> <p>8 [REDACTED]</p> <p>9 [REDACTED]</p> <p>10 [REDACTED]</p> <p>11 [REDACTED]</p> <p>12 [REDACTED]</p> <p>13 [REDACTED]</p> <p>14 [REDACTED]</p> <p>15 [REDACTED]</p> <p>16 [REDACTED]</p> <p>17 [REDACTED]</p> <p>18 [REDACTED]</p> <p>19 [REDACTED]</p> <p>20 for just one second, Parvin?</p> <p>21 VIDEO TECHNICIAN: Going off</p> <p>22 the record. 11:20 a.m.</p> <p>23 - - -</p> <p>24 (Whereupon, a brief recess</p>

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<p>Page 114</p> <p>1 was taken.)</p> <p>2 - - -</p> <p>3 VIDEO TECHNICIAN: We're</p> <p>4 back on the record at 11:38 a.m.</p> <p>5 BY MS. AMINOLROAYA:</p> <p>6 Q. Welcome back, Ms. Kitlinski.</p> <p>7 A. Thank you.</p> <p>8 Q. We just took a short break.</p> <p>9 MS. AMINOLROAYA: I'm</p> <p>10 handing you what's been marked as</p> <p>11 [REDACTED]</p> <p>12 [REDACTED]</p> <p>13 [REDACTED]</p> <p>14 [REDACTED]</p> <p>15 [REDACTED]</p> <p>16 [REDACTED]</p> <p>17 [REDACTED]</p> <p>18 [REDACTED]</p> <p>19 [REDACTED]</p> <p>20 [REDACTED]</p> <p>21 [REDACTED]</p> <p>22 [REDACTED]</p> <p>23 [REDACTED]</p> <p>24 [REDACTED]</p>	<p>Page 116</p> <p>1 [REDACTED]</p> <p>2 [REDACTED]</p> <p>3 [REDACTED]</p> <p>4 [REDACTED]</p> <p>5 [REDACTED]</p> <p>6 [REDACTED]</p> <p>7 [REDACTED]</p> <p>8 [REDACTED]</p> <p>9 [REDACTED]</p> <p>10 [REDACTED]</p> <p>11 [REDACTED]</p> <p>12 [REDACTED]</p> <p>13 [REDACTED]</p> <p>14 [REDACTED]</p> <p>15 [REDACTED]</p> <p>16 [REDACTED]</p> <p>17 [REDACTED]</p> <p>18 [REDACTED]</p> <p>19 [REDACTED]</p> <p>20 [REDACTED]</p> <p>21 [REDACTED]</p> <p>22 [REDACTED]</p> <p>23 [REDACTED]</p> <p>24 [REDACTED]</p>
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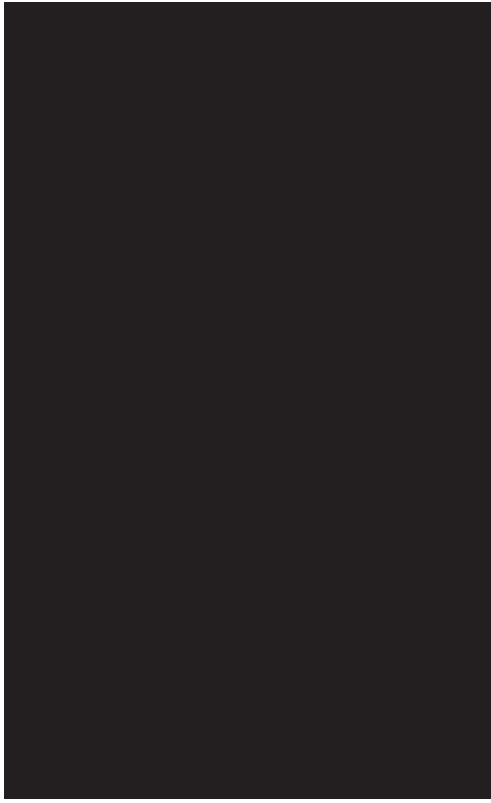
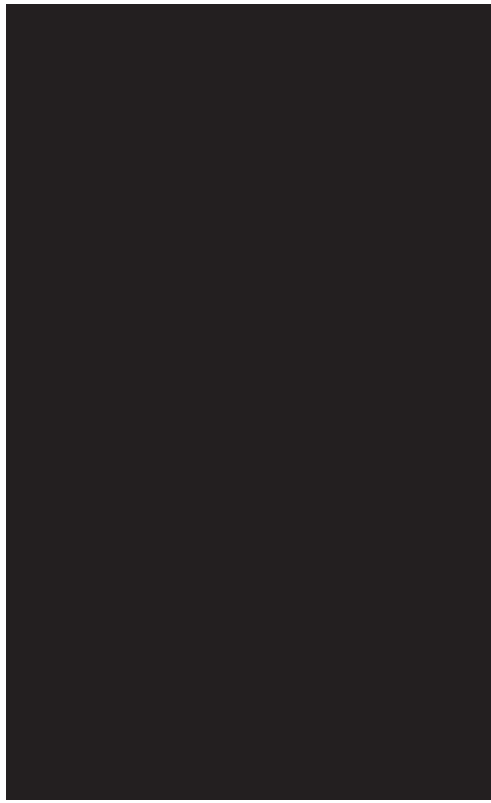
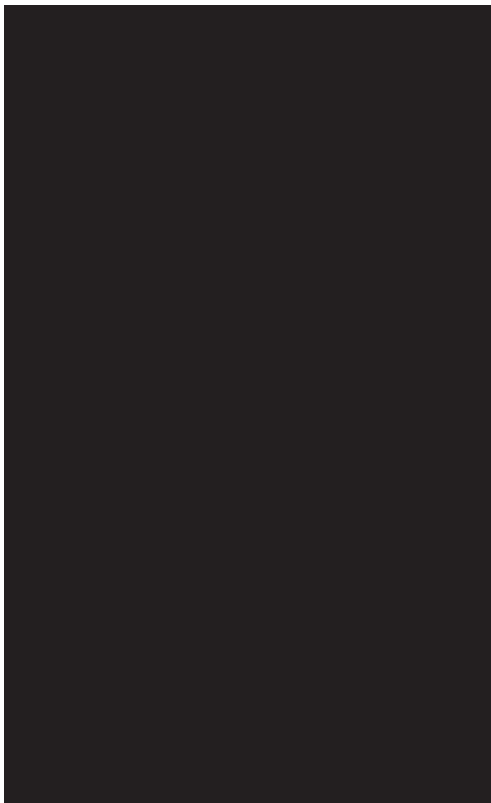

<p>Page 130</p> <p>1 2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23 24</p> 	<p>Page 132</p> <p>1 2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23 24</p> 
<p>Page 131</p> <p>1 2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23 24</p> 	<p>Page 133</p> <p>1 2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23 24</p> 

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<p>Page 139</p> <p>1 2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23 24</p> 	<p>Page 141</p> <p>1 2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23 24</p> 

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<p>Page 143</p> <p>1 2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23 24</p> 	<p>Page 145</p> <p>1 2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23 24</p> 

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<p>Page 147</p> <p>1 strike the entire answer.</p> <p>2 1274, please. I'm handing</p> <p>3 you what's been marked as</p> <p>4 Exhibit-1274.</p> <p>5 - - -</p> <p>6 (Whereupon, Endo-Kitlinski</p> <p>7 [REDACTED]</p> <p>8 [REDACTED]</p> <p>9 [REDACTED]</p> <p>10 [REDACTED]</p> <p>11 [REDACTED]</p> <p>12 [REDACTED]</p> <p>13 [REDACTED]</p> <p>14 [REDACTED]</p> <p>15 [REDACTED]</p> <p>16 [REDACTED]</p> <p>17 [REDACTED]</p> <p>18 [REDACTED]</p> <p>19 [REDACTED]</p> <p>20 [REDACTED]</p> <p>21 [REDACTED]</p> <p>22 [REDACTED]</p> <p>23 [REDACTED]</p> <p>24 [REDACTED]</p>	<p>Page 149</p> <p>1 [REDACTED]</p> <p>2 [REDACTED]</p> <p>3 [REDACTED]</p> <p>4 [REDACTED]</p> <p>5 [REDACTED]</p> <p>6 [REDACTED]</p> <p>7 [REDACTED]</p> <p>8 [REDACTED]</p> <p>9 [REDACTED]</p> <p>10 [REDACTED]</p> <p>11 [REDACTED]</p> <p>12 [REDACTED]</p> <p>13 [REDACTED]</p> <p>14 [REDACTED]</p> <p>15 [REDACTED]</p> <p>16 [REDACTED]</p> <p>17 [REDACTED]</p> <p>18 [REDACTED]</p> <p>19 [REDACTED]</p> <p>20 [REDACTED]</p> <p>21 [REDACTED]</p> <p>22 [REDACTED]</p> <p>23 [REDACTED]</p> <p>24 [REDACTED]</p>

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<div>Page 151</div> <div><div>1</div><div>2</div><div>3</div><div>4</div><div>5</div><div>6</div><div>7</div><div>8</div><div>9</div><div>10</div><div>11</div><div>12</div><div>13</div><div>14</div><div>15</div><div>16</div><div>17</div><div>18</div><div>19</div><div>20</div><div>21</div><div>22</div><div>23</div><div>24</div></div>	<div>Page 153</div> <div><div>1</div><div>2</div><div>3</div><div>4</div><div>5</div><div>6</div><div>7</div><div>8</div><div>9</div><div>10</div><div>11</div><div>12</div><div>13</div><div>14</div><div>15</div><div>16</div><div>17</div><div>18</div><div>19</div><div>20</div><div>21</div><div>22</div><div>23</div><div>24</div></div>

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<p>Page 154</p> <p>1 [REDACTED]</p> <p>2 [REDACTED]</p> <p>3 [REDACTED]</p> <p>4 [REDACTED]</p> <p>5 [REDACTED]</p> <p>6 [REDACTED]</p> <p>7 [REDACTED]</p> <p>8 [REDACTED]</p> <p>9 [REDACTED]</p> <p>10 [REDACTED]</p> <p>11 [REDACTED]</p> <p>12 [REDACTED]</p> <p>13 [REDACTED]</p> <p>14 [REDACTED]</p> <p>15 [REDACTED]</p> <p>16 [REDACTED]</p> <p>17 [REDACTED]</p> <p>18 [REDACTED]</p> <p>19 [REDACTED]</p> <p>20 [REDACTED]</p> <p>21 [REDACTED]</p> <p>22 [REDACTED]</p> <p>23 [REDACTED]</p> <p>24 [REDACTED]</p>	<p>Page 156</p> <p>1 [REDACTED]</p> <p>2 [REDACTED]</p> <p>3 [REDACTED]</p> <p>4 [REDACTED]</p> <p>5 [REDACTED]</p> <p>6 [REDACTED]</p> <p>7 [REDACTED]</p> <p>8 [REDACTED]</p> <p>9 [REDACTED]</p> <p>10 [REDACTED]</p> <p>11 [REDACTED]</p> <p>12 [REDACTED]</p> <p>13 [REDACTED]</p> <p>14 [REDACTED]</p> <p>15 [REDACTED]</p> <p>16 [REDACTED]</p> <p>17 [REDACTED]</p> <p>18 [REDACTED]</p> <p>19 [REDACTED]</p> <p>20 [REDACTED]</p> <p>21 [REDACTED]</p> <p>22 [REDACTED]</p> <p>23 [REDACTED]</p> <p>24 [REDACTED]</p>
<p>Page 155</p> <p>1 [REDACTED]</p> <p>2 [REDACTED]</p> <p>3 [REDACTED]</p> <p>4 [REDACTED]</p> <p>5 [REDACTED]</p> <p>6 [REDACTED]</p> <p>7 [REDACTED]</p> <p>8 [REDACTED]</p> <p>9 [REDACTED]</p> <p>10 [REDACTED]</p> <p>11 [REDACTED]</p> <p>12 [REDACTED]</p> <p>13 [REDACTED]</p> <p>14 [REDACTED]</p> <p>15 [REDACTED]</p> <p>16 [REDACTED]</p> <p>17 [REDACTED]</p> <p>18 [REDACTED]</p> <p>19 [REDACTED]</p> <p>20 [REDACTED]</p> <p>21 [REDACTED]</p> <p>22 [REDACTED]</p> <p>23 [REDACTED]</p> <p>24 [REDACTED]</p>	<p>Page 157</p> <p>1 [REDACTED]</p> <p>2 [REDACTED]</p> <p>3 [REDACTED]</p> <p>4 [REDACTED]</p> <p>5 [REDACTED]</p> <p>6 [REDACTED]</p> <p>7 [REDACTED]</p> <p>8 [REDACTED]</p> <p>9 [REDACTED]</p> <p>10 [REDACTED]</p> <p>11 [REDACTED]</p> <p>12 [REDACTED]</p> <p>13 [REDACTED]</p> <p>14 [REDACTED]</p> <p>15 [REDACTED]</p> <p>16 [REDACTED]</p> <p>17 [REDACTED]</p> <p>18 [REDACTED]</p> <p>19 [REDACTED]</p> <p>20 [REDACTED]</p> <p>21 [REDACTED]</p> <p>22 [REDACTED]</p> <p>23 [REDACTED]</p> <p>24 [REDACTED]</p>

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<p>Page 159</p> <p>1 [REDACTED]</p> <p>2 [REDACTED]</p> <p>3 [REDACTED]</p> <p>4 [REDACTED]</p> <p>5 [REDACTED]</p> <p>6 [REDACTED]</p> <p>7 [REDACTED]</p> <p>8 [REDACTED]</p> <p>9 [REDACTED]</p> <p>10 [REDACTED]</p> <p>11 [REDACTED]</p> <p>12 [REDACTED]</p> <p>13 [REDACTED]</p> <p>14 [REDACTED]</p> <p>15 [REDACTED]</p> <p>16 [REDACTED]</p> <p>17 [REDACTED]</p> <p>18 [REDACTED]</p> <p>19 [REDACTED]</p> <p>20 [REDACTED]</p> <p>21 [REDACTED]</p> <p>22 [REDACTED]</p> <p>23 [REDACTED]</p> <p>24 [REDACTED]</p>	<p>Page 161</p> <p>1 [REDACTED]</p> <p>2 [REDACTED]</p> <p>3 [REDACTED]</p> <p>4 [REDACTED]</p> <p>5 [REDACTED]</p> <p>6 [REDACTED]</p> <p>7 [REDACTED]</p> <p>8 [REDACTED]</p> <p>9 [REDACTED]</p> <p>10 [REDACTED]</p> <p>11 [REDACTED]</p> <p>12 [REDACTED]</p> <p>13 [REDACTED]</p> <p>14 [REDACTED]</p> <p>15 [REDACTED]</p> <p>16 [REDACTED]</p> <p>17 [REDACTED]</p> <p>18 [REDACTED]</p> <p>19 [REDACTED]</p> <p>20 [REDACTED]</p> <p>21 [REDACTED]</p> <p>22 [REDACTED]</p> <p>23 [REDACTED]</p> <p>24 [REDACTED]</p>

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<p style="text-align: right;">Page 162</p> <p>1 [REDACTED] 2 [REDACTED] 3 [REDACTED] 4 [REDACTED] 5 [REDACTED] 6 [REDACTED] 7 [REDACTED] 8 [REDACTED] 9 [REDACTED] 10 [REDACTED] 11 [REDACTED] 12 [REDACTED] 13 [REDACTED] 14 [REDACTED] 15 [REDACTED] 16 [REDACTED] 17 [REDACTED] 18 [REDACTED] 19 [REDACTED] 20 [REDACTED] 21 [REDACTED] 22 [REDACTED] 23 MR. DAVIS: Do you know if 24 the original document as produced</p>	<p style="text-align: right;">Page 164</p> <p>1 version that was produced to us in the 2 production -- 3 A. Sure. 4 Q. -- after the deposition. 5 [REDACTED] 6 [REDACTED] 7 [REDACTED] 8 [REDACTED] 9 [REDACTED] 10 [REDACTED] 11 [REDACTED] 12 [REDACTED] 13 [REDACTED] 14 [REDACTED] 15 [REDACTED] 16 [REDACTED] 17 [REDACTED] 18 [REDACTED] 19 [REDACTED] 20 [REDACTED] 21 [REDACTED] 22 [REDACTED] 23 [REDACTED] 24 [REDACTED]</p>
<p style="text-align: right;">Page 163</p> <p>1 had this highlighting? 2 MS. AMINOLROAYA: Is that 3 the only highlight you see in the 4 document? 5 MR. DAVIS: I see some -- we 6 can go off if you want -- I see 7 the first e-mail where you just 8 read, I think I see some -- 9 MS. AMINOLROAYA: Sure, we 10 can go off the record. 11 VIDEO TECHNICIAN: Going off 12 the record. 12:28 p.m. 13 - - - 14 (Whereupon, a discussion off 15 the record occurred.) 16 - - - 17 VIDEO TECHNICIAN: Back on 18 record. 12:28 p.m. 19 BY MS. AMINOLROAYA: 20 Q. Welcome back. 21 We have a highlighted copy, 22 we gave you and counsel a highlighted 23 copy of Exhibit-13, I believe. And we'll 24 replace this highlighted copy with the</p>	<p style="text-align: right;">Page 165</p> <p>1 [REDACTED] 2 [REDACTED] 3 [REDACTED] 4 [REDACTED] 5 [REDACTED] 6 [REDACTED] 7 [REDACTED] 8 [REDACTED] 9 [REDACTED] 10 [REDACTED] 11 [REDACTED] 12 [REDACTED] 13 [REDACTED] 14 [REDACTED] 15 [REDACTED] 16 [REDACTED] 17 [REDACTED] 18 [REDACTED] 19 [REDACTED] 20 [REDACTED] 21 [REDACTED] 22 [REDACTED] 23 [REDACTED] 24 [REDACTED]</p>

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<p>Page 166</p> <p>1 [REDACTED]</p> <p>2 [REDACTED]</p> <p>3 [REDACTED]</p> <p>4 [REDACTED]</p> <p>5 [REDACTED]</p> <p>6 [REDACTED]</p> <p>7 [REDACTED]</p> <p>8 [REDACTED]</p> <p>9 [REDACTED]</p> <p>10 [REDACTED]</p> <p>11 [REDACTED]</p> <p>12 [REDACTED]</p> <p>13 [REDACTED]</p> <p>14 [REDACTED]</p> <p>15 [REDACTED]</p> <p>16 [REDACTED]</p> <p>17 [REDACTED]</p> <p>18 [REDACTED]</p> <p>19 [REDACTED]</p> <p>20 [REDACTED]</p> <p>21 [REDACTED]</p> <p>22 [REDACTED]</p> <p>23 [REDACTED]</p> <p>24 [REDACTED]</p>	<p>Page 168</p> <p>1 [REDACTED]</p> <p>2 [REDACTED]</p> <p>3 [REDACTED]</p> <p>4 [REDACTED]</p> <p>5 [REDACTED]</p> <p>6 [REDACTED]</p> <p>7 [REDACTED]</p> <p>8 [REDACTED]</p> <p>9 [REDACTED]</p> <p>10 [REDACTED]</p> <p>11 [REDACTED]</p> <p>12 [REDACTED]</p> <p>13 [REDACTED]</p> <p>14 [REDACTED]</p> <p>15 [REDACTED]</p> <p>16 [REDACTED]</p> <p>17 [REDACTED]</p> <p>18 [REDACTED]</p> <p>19 [REDACTED]</p> <p>20 [REDACTED]</p> <p>21 [REDACTED]</p> <p>22 [REDACTED]</p> <p>23 [REDACTED]</p> <p>24 [REDACTED]</p>
<p>Page 167</p> <p>1 [REDACTED]</p> <p>2 [REDACTED]</p> <p>3 [REDACTED]</p> <p>4 [REDACTED]</p> <p>5 [REDACTED]</p> <p>6 [REDACTED]</p> <p>7 [REDACTED]</p> <p>8 [REDACTED]</p> <p>9 [REDACTED]</p> <p>10 [REDACTED]</p> <p>11 [REDACTED]</p> <p>12 [REDACTED]</p> <p>13 [REDACTED]</p> <p>14 [REDACTED]</p> <p>15 [REDACTED]</p> <p>16 [REDACTED]</p> <p>17 [REDACTED]</p> <p>18 [REDACTED]</p> <p>19 [REDACTED]</p> <p>20 [REDACTED]</p> <p>21 [REDACTED]</p> <p>22 [REDACTED]</p> <p>23 [REDACTED]</p> <p>24 [REDACTED]</p>	<p>Page 169</p> <p>1 [REDACTED]</p> <p>2 [REDACTED]</p> <p>3 [REDACTED]</p> <p>4 [REDACTED]</p> <p>5 [REDACTED]</p> <p>6 [REDACTED]</p> <p>7 [REDACTED]</p> <p>8 [REDACTED]</p> <p>9 MS. AMINOLROAYA: Move to</p> <p>10 strike everything after "yes."</p> <p>11 Can we get a copy of E1403?</p> <p>12 MR. DAVIS: How much do you</p> <p>13 have with this one, Parvin? It's</p> <p>14 been about an hour, it's 12:30.</p> <p>15 I'm happy to go a little bit</p> <p>16 longer if you only have a bit.</p> <p>17 But if it's longer than that, then</p> <p>18 we should break.</p> <p>19 MS. AMINOLROAYA: Let's do</p> <p>20 at -- a few more exhibits.</p> <p>21 I'm handing you what's been</p> <p>22 marked as Exhibit-1403. This is</p> <p>23 [REDACTED]</p> <p>24 [REDACTED]</p>

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<p>Page 170</p> <p>1 [REDACTED]</p> <p>2 [REDACTED]</p> <p>3 [REDACTED]</p> <p>4 [REDACTED]</p> <p>5 [REDACTED]</p> <p>6 [REDACTED]</p> <p>7 [REDACTED]</p> <p>8 [REDACTED]</p> <p>9 [REDACTED]</p> <p>10 [REDACTED]</p> <p>11 [REDACTED]</p> <p>12 [REDACTED]</p> <p>13 [REDACTED]</p> <p>14 May I just have a minute to</p> <p>15 read this, please?</p> <p>16 Q. Sure.</p> <p>17 And I can tell you we're</p> <p>18 going to look at the top of Page 2 and</p> <p>19 Page 1.</p> <p>20 A. Okay.</p> <p>21 MS. AMINOLROAYA: We can</p> <p>22 take a break for lunch now.</p> <p>23 VIDEO TECHNICIAN: Going off</p> <p>24 the record. 12:36 p.m.</p>	<p>Page 172</p> <p>1 [REDACTED]</p> <p>2 [REDACTED]</p> <p>3 [REDACTED]</p> <p>4 [REDACTED]</p> <p>5 [REDACTED]</p> <p>6 [REDACTED]</p> <p>7 [REDACTED]</p> <p>8 [REDACTED]</p> <p>9 [REDACTED]</p> <p>10 [REDACTED]</p> <p>11 [REDACTED]</p> <p>12 [REDACTED]</p> <p>13 [REDACTED]</p> <p>14 [REDACTED]</p> <p>15 [REDACTED]</p> <p>16 [REDACTED]</p> <p>17 [REDACTED]</p> <p>18 [REDACTED]</p> <p>19 [REDACTED]</p> <p>20 [REDACTED]</p> <p>21 [REDACTED]</p> <p>22 [REDACTED]</p> <p>23 [REDACTED]</p> <p>24 [REDACTED]</p>
<p>Page 171</p> <p>1 - - -</p> <p>2 (Whereupon, a luncheon</p> <p>3 recess was taken.)</p> <p>4 - - -</p> <p>5 VIDEO TECHNICIAN: Back on</p> <p>6 record at 1:24 p.m.</p> <p>7 BY MS. AMINOLROAYA:</p> <p>8 Q. Welcome back, Ms. Kitlinski.</p> <p>9 We just took a break for lunch, and we're</p> <p>10 back on the record.</p> <p>11 You understand that you're</p> <p>12 under oath?</p> <p>13 A. Yes.</p> <p>14 Q. Turning your attention back</p> <p>15 [REDACTED]</p> <p>16 [REDACTED]</p> <p>17 [REDACTED]</p> <p>18 [REDACTED]</p> <p>19 [REDACTED]</p> <p>20 [REDACTED]</p> <p>21 [REDACTED]</p> <p>22 [REDACTED]</p> <p>23 [REDACTED]</p> <p>24 [REDACTED]</p>	<p>Page 173</p> <p>1 [REDACTED]</p> <p>2 [REDACTED]</p> <p>3 [REDACTED]</p> <p>4 [REDACTED]</p> <p>5 [REDACTED]</p> <p>6 [REDACTED]</p> <p>7 [REDACTED]</p> <p>8 [REDACTED]</p> <p>9 [REDACTED]</p> <p>10 [REDACTED]</p> <p>11 [REDACTED]</p> <p>12 [REDACTED]</p> <p>13 [REDACTED]</p> <p>14 [REDACTED]</p> <p>15 [REDACTED]</p> <p>16 [REDACTED]</p> <p>17 [REDACTED]</p> <p>18 [REDACTED]</p> <p>19 [REDACTED]</p> <p>20 [REDACTED]</p> <p>21 [REDACTED]</p> <p>22 [REDACTED]</p> <p>23 [REDACTED]</p> <p>24 [REDACTED]</p>

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<p>Page 174</p> <p>1 [REDACTED]</p> <p>2 [REDACTED]</p> <p>3 [REDACTED]</p> <p>4 [REDACTED]</p> <p>5 [REDACTED]</p> <p>6 [REDACTED]</p> <p>7 [REDACTED]</p> <p>8 [REDACTED]</p> <p>9 [REDACTED]</p> <p>10 [REDACTED]</p> <p>11 [REDACTED]</p> <p>12 [REDACTED]</p> <p>13 [REDACTED]</p> <p>14 [REDACTED]</p> <p>15 [REDACTED]</p> <p>16 [REDACTED]</p> <p>17 form.</p> <p>18 MS. AMINOLROAYA: Can I have</p> <p>19 1306, please?</p> <p>20 VIDEO TECHNICIAN: Going off</p> <p>21 the record. 1:27 p.m.</p> <p>22 - - -</p> <p>23 (Whereupon, a brief recess</p> <p>24 was taken.)</p>	<p>Page 176</p> <p>1 [REDACTED]</p> <p>2 [REDACTED]</p> <p>3 [REDACTED]</p> <p>4 [REDACTED]</p> <p>5 [REDACTED]</p> <p>6 [REDACTED]</p> <p>7 [REDACTED]</p> <p>8 [REDACTED]</p> <p>9 [REDACTED]</p> <p>10 [REDACTED]</p> <p>11 [REDACTED]</p> <p>12 [REDACTED]</p> <p>13 [REDACTED]</p> <p>14 [REDACTED]</p> <p>15 [REDACTED]</p> <p>16 [REDACTED]</p> <p>17 [REDACTED]</p> <p>18 [REDACTED]</p> <p>19 [REDACTED]</p> <p>20 [REDACTED]</p> <p>21 [REDACTED]</p> <p>22 [REDACTED]</p> <p>23 [REDACTED]</p> <p>24 [REDACTED]</p>
<p>Page 175</p> <p>1 - - -</p> <p>2 VIDEO TECHNICIAN: Back on</p> <p>3 the record at 1:29 p.m.</p> <p>4 MS. AMINOLROAYA: Ms.</p> <p>5 Kitlinski, I'm handing you what's</p> <p>6 been marked as Exhibit-15. This</p> <p>7 [REDACTED]</p> <p>8 [REDACTED]</p> <p>9 [REDACTED]</p> <p>10 [REDACTED]</p> <p>11 [REDACTED]</p> <p>12 [REDACTED]</p> <p>13 [REDACTED]</p> <p>14 [REDACTED]</p> <p>15 [REDACTED]</p> <p>16 [REDACTED]</p> <p>17 [REDACTED]</p> <p>18 [REDACTED]</p> <p>19 [REDACTED]</p> <p>20 [REDACTED]</p> <p>21 [REDACTED]</p> <p>22 [REDACTED]</p> <p>23 [REDACTED]</p> <p>24 [REDACTED]</p>	<p>Page 177</p> <p>1 [REDACTED]</p> <p>2 [REDACTED]</p> <p>3 [REDACTED]</p> <p>4 [REDACTED]</p> <p>5 [REDACTED]</p> <p>6 [REDACTED]</p> <p>7 [REDACTED]</p> <p>8 [REDACTED]</p> <p>9 [REDACTED]</p> <p>10 [REDACTED]</p> <p>11 [REDACTED]</p> <p>12 [REDACTED]</p> <p>13 [REDACTED]</p> <p>14 [REDACTED]</p> <p>15 [REDACTED]</p> <p>16 [REDACTED]</p> <p>17 [REDACTED]</p> <p>18 [REDACTED]</p> <p>19 [REDACTED]</p> <p>20 Q. And Opana ER was launched in</p> <p>21 the summer of 2006; is that correct?</p> <p>22 A. I recall it was 2006. I'm</p> <p>23 sorry, I don't recall when -- when during</p> <p>24 the course of the year.</p>

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<p>Page 178</p> <p>1 Q. That's fine. 2006 is fine.</p> <p>2</p> <p>3</p> <p>4</p> <p>5</p> <p>6</p> <p>7</p> <p>8</p> <p>9</p> <p>10</p> <p>11</p> <p>12</p> <p>13</p> <p>14</p> <p>15</p> <p>16</p> <p>17</p> <p>18</p> <p>19</p> <p>20</p> <p>21</p> <p>22</p> <p>23</p> <p>24</p>	<p>Page 180</p> <p>1</p> <p>2</p> <p>3</p> <p>4</p> <p>5</p> <p>6</p> <p>7</p> <p>8</p> <p>9</p> <p>10</p> <p>11</p> <p>12</p> <p>13</p> <p>14</p> <p>15</p> <p>16</p> <p>17</p> <p>18</p> <p>19</p> <p>20</p> <p>21</p> <p>22</p> <p>23</p> <p>24</p>
<p>Page 179</p> <p>1</p> <p>2</p> <p>3</p> <p>4</p> <p>5</p> <p>6</p> <p>7</p> <p>8</p> <p>9</p> <p>10</p> <p>11</p> <p>12</p> <p>13</p> <p>14</p> <p>15</p> <p>16</p> <p>17</p> <p>18</p> <p>19</p> <p>20</p> <p>21</p> <p>22</p> <p>23</p> <p>24</p>	<p>Page 181</p> <p>1</p> <p>2</p> <p>3</p> <p>4</p> <p>5</p> <p>6</p> <p>7</p> <p>8</p> <p>9</p> <p>10</p> <p>11</p> <p>12</p> <p>13</p> <p>14</p> <p>15</p> <p>16</p> <p>17</p> <p>18</p> <p>19</p> <p>20</p> <p>21</p> <p>22</p> <p>23</p> <p>24</p>

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<p>Page 182</p> <p>1 [REDACTED]</p> <p>2 [REDACTED]</p> <p>3 [REDACTED]</p> <p>4 [REDACTED]</p> <p>5 [REDACTED]</p> <p>6 [REDACTED]</p> <p>7 [REDACTED]</p> <p>8 [REDACTED]</p> <p>9 [REDACTED]</p> <p>10 [REDACTED]</p> <p>11 [REDACTED]</p> <p>12 [REDACTED]</p> <p>13 [REDACTED]</p> <p>14 [REDACTED]</p> <p>15 [REDACTED]</p> <p>16 [REDACTED]</p> <p>17 [REDACTED]</p> <p>18 [REDACTED]</p> <p>19 [REDACTED]</p> <p>20 [REDACTED]</p> <p>21 [REDACTED]</p> <p>22 [REDACTED]</p> <p>23 [REDACTED]</p> <p>24 [REDACTED]</p>	<p>Page 184</p> <p>1 [REDACTED]</p> <p>2 [REDACTED]</p> <p>3 [REDACTED]</p> <p>4 [REDACTED]</p> <p>5 [REDACTED]</p> <p>6 [REDACTED]</p> <p>7 [REDACTED]</p> <p>8 [REDACTED]</p> <p>9 [REDACTED]</p> <p>10 [REDACTED]</p> <p>11 [REDACTED]</p> <p>12 [REDACTED]</p> <p>13 [REDACTED]</p> <p>14 [REDACTED]</p> <p>15 [REDACTED]</p> <p>16 [REDACTED]</p> <p>17 [REDACTED]</p> <p>18 [REDACTED]</p> <p>19 [REDACTED]</p> <p>20 [REDACTED]</p> <p>21 [REDACTED]</p> <p>22 [REDACTED]</p> <p>23 [REDACTED]</p> <p>24 [REDACTED]</p>
<p>Page 183</p> <p>1 [REDACTED]</p> <p>2 [REDACTED]</p> <p>3 [REDACTED]</p> <p>4 [REDACTED]</p> <p>5 [REDACTED]</p> <p>6 [REDACTED]</p> <p>7 that?</p> <p>8 Q. You can do it with your</p> <p>9 counsel.</p> <p>10 THE WITNESS: I was just</p> <p>11 going to say --</p> <p>12 MR. DAVIS: We can talk</p> <p>13 about that later.</p> <p>14 MS. AMINOLROAYA: 1313,</p> <p>15 please. We're skipping one</p> <p>16 exhibit, 16, and going on to 17.</p> <p>17 We added that sticker to another</p> <p>18 document we're not using.</p> <p>19 Exhibit-17 is</p> <p>20 MDL_KP360_000000002. It's E1313.</p> <p>21 - - -</p> <p>22 (Whereupon Endo-Kitlinski</p> <p>23 [REDACTED]</p> <p>24 [REDACTED]</p>	<p>Page 185</p> <p>1 [REDACTED]</p> <p>2 [REDACTED]</p> <p>3 [REDACTED]</p> <p>4 [REDACTED]</p> <p>5 [REDACTED]</p> <p>6 [REDACTED]</p> <p>7 [REDACTED]</p> <p>8 [REDACTED]</p> <p>9 [REDACTED]</p> <p>10 [REDACTED]</p> <p>11 [REDACTED]</p> <p>12 [REDACTED]</p> <p>13 [REDACTED]</p> <p>14 [REDACTED]</p> <p>15 [REDACTED]</p> <p>16 [REDACTED]</p> <p>17 [REDACTED]</p> <p>18 [REDACTED]</p> <p>19 [REDACTED]</p> <p>20 [REDACTED]</p> <p>21 [REDACTED]</p> <p>22 [REDACTED]</p> <p>23 [REDACTED]</p> <p>24 [REDACTED]</p>

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<p>Page 187</p> <p>1 [REDACTED]</p> <p>2 [REDACTED]</p> <p>3 [REDACTED]</p> <p>4 [REDACTED]</p> <p>5 [REDACTED]</p> <p>6 [REDACTED]</p> <p>7 [REDACTED]</p> <p>8 [REDACTED]</p> <p>9 [REDACTED]</p> <p>10 [REDACTED]</p> <p>11 [REDACTED]</p> <p>12 [REDACTED]</p> <p>13 [REDACTED]</p> <p>14 [REDACTED]</p> <p>15 [REDACTED]</p> <p>16 [REDACTED]</p> <p>17 [REDACTED]</p> <p>18 [REDACTED]</p> <p>19 [REDACTED]</p> <p>20 [REDACTED]</p> <p>21 [REDACTED]</p> <p>22 [REDACTED]</p> <p>23 [REDACTED]</p> <p>24 [REDACTED]</p>	<p>Page 189</p> <p>1 [REDACTED]</p> <p>2 [REDACTED]</p> <p>3 [REDACTED]</p> <p>4 [REDACTED]</p> <p>5 [REDACTED]</p> <p>6 [REDACTED]</p> <p>7 [REDACTED]</p> <p>8 [REDACTED]</p> <p>9 [REDACTED]</p> <p>10 [REDACTED]</p> <p>11 [REDACTED]</p> <p>12 [REDACTED]</p> <p>13 [REDACTED]</p> <p>14 [REDACTED]</p> <p>15 [REDACTED]</p> <p>16 [REDACTED]</p> <p>17 [REDACTED]</p> <p>18 [REDACTED]</p> <p>19 [REDACTED]</p> <p>20 [REDACTED]</p> <p>21 [REDACTED]</p> <p>22 [REDACTED]</p> <p>23 [REDACTED]</p> <p>24 [REDACTED]</p>

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<p>Page 190</p> <p>1 [REDACTED]</p> <p>2 [REDACTED]</p> <p>3 [REDACTED]</p> <p>4 [REDACTED]</p> <p>5 [REDACTED]</p> <p>6 [REDACTED]</p> <p>7 [REDACTED]</p> <p>8 [REDACTED]</p> <p>9 [REDACTED]</p> <p>10 [REDACTED]</p> <p>11 [REDACTED]</p> <p>12 [REDACTED]</p> <p>13 [REDACTED]</p> <p>14 [REDACTED]</p> <p>15 [REDACTED]</p> <p>16 [REDACTED]</p> <p>17 [REDACTED]</p> <p>18 [REDACTED]</p> <p>19 [REDACTED]</p> <p>20 [REDACTED]</p> <p>21 [REDACTED]</p> <p>22 [REDACTED]</p> <p>23 [REDACTED]</p> <p>24 [REDACTED]</p>	<p>Page 192</p> <p>1 MR. DAVIS: Do you have</p> <p>2 copies, please?</p> <p>3 MS. AMINOLROAYA: And if you</p> <p>4 could just hand me back that</p> <p>5 document for a moment, I'm going</p> <p>6 to add an exhibit number to this.</p> <p>7 - - -</p> <p>8 (Whereupon, Endo-Kitlinski</p> <p>9 Exhibit-19, No Bates, Endo Payment</p> <p>10 to NIPC, 2003-2012, was marked for</p> <p>11 identification.)</p> <p>12 - - -</p> <p>13 MS. AMINOLROAYA: For the</p> <p>14 [REDACTED]</p> <p>15 [REDACTED]</p> <p>16 [REDACTED]</p> <p>17 [REDACTED]</p> <p>18 [REDACTED]</p> <p>19 [REDACTED]</p> <p>20 [REDACTED]</p> <p>21 [REDACTED]</p> <p>22 [REDACTED]</p> <p>23 [REDACTED]</p> <p>24 [REDACTED]</p>
<p>Page 191</p> <p>1 [REDACTED]</p> <p>2 [REDACTED]</p> <p>3 [REDACTED]</p> <p>4 [REDACTED]</p> <p>5 [REDACTED]</p> <p>6 [REDACTED]</p> <p>7 [REDACTED]</p> <p>8 [REDACTED]</p> <p>9 [REDACTED]</p> <p>10 [REDACTED]</p> <p>11 [REDACTED]</p> <p>12 [REDACTED]</p> <p>13 [REDACTED]</p> <p>14 [REDACTED]</p> <p>15 [REDACTED]</p> <p>16 [REDACTED]</p> <p>17 [REDACTED]</p> <p>18 [REDACTED]</p> <p>19 [REDACTED]</p> <p>20 [REDACTED]</p> <p>21 [REDACTED]</p> <p>22 [REDACTED]</p> <p>23 [REDACTED]</p> <p>24 [REDACTED]</p>	<p>Page 193</p> <p>1 [REDACTED]</p> <p>2 [REDACTED]</p> <p>3 [REDACTED]</p> <p>4 [REDACTED]</p> <p>5 [REDACTED]</p> <p>6 [REDACTED]</p> <p>7 [REDACTED]</p> <p>8 [REDACTED]</p> <p>9 [REDACTED]</p> <p>10 [REDACTED]</p> <p>11 [REDACTED]</p> <p>12 [REDACTED]</p> <p>13 [REDACTED]</p> <p>14 [REDACTED]</p> <p>15 [REDACTED]</p> <p>16 [REDACTED]</p> <p>17 [REDACTED]</p> <p>18 [REDACTED]</p> <p>19 [REDACTED]</p> <p>20 [REDACTED]</p> <p>21 [REDACTED]</p> <p>22 [REDACTED]</p> <p>23 [REDACTED]</p> <p>24 [REDACTED]</p>

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<p>Page 194</p> <p>1 [REDACTED]</p> <p>2 [REDACTED]</p> <p>3 [REDACTED]</p> <p>4 [REDACTED]</p> <p>5 [REDACTED]</p> <p>6 [REDACTED]</p> <p>7 [REDACTED]</p> <p>8 [REDACTED]</p> <p>9 [REDACTED]</p> <p>10 [REDACTED]</p> <p>11 [REDACTED]</p> <p>12 [REDACTED]</p> <p>13 [REDACTED]</p> <p>14 [REDACTED]</p> <p>15 [REDACTED]</p> <p>16 [REDACTED]</p> <p>17 [REDACTED]</p> <p>18 [REDACTED]</p> <p>19 [REDACTED]</p> <p>20 [REDACTED]</p> <p>21 [REDACTED]</p> <p>22 [REDACTED]</p> <p>23 [REDACTED]</p> <p>24 [REDACTED]</p>	<p>Page 196</p> <p>1 [REDACTED]</p> <p>2 [REDACTED]</p> <p>3 [REDACTED]</p> <p>4 [REDACTED]</p> <p>5 [REDACTED]</p> <p>6 [REDACTED]</p> <p>7 [REDACTED]</p> <p>8 [REDACTED]</p> <p>9 [REDACTED]</p> <p>10 [REDACTED]</p> <p>11 [REDACTED]</p> <p>12 [REDACTED]</p> <p>13 [REDACTED]</p> <p>14 [REDACTED]</p> <p>15 [REDACTED]</p> <p>16 [REDACTED]</p> <p>17 [REDACTED]</p> <p>18 [REDACTED]</p> <p>19 [REDACTED]</p> <p>20 [REDACTED]</p> <p>21 [REDACTED]</p> <p>22 [REDACTED]</p> <p>23 [REDACTED]</p> <p>24 [REDACTED]</p>
<p>Page 195</p> <p>1 [REDACTED]</p> <p>2 [REDACTED]</p> <p>3 [REDACTED]</p> <p>4 [REDACTED]</p> <p>5 [REDACTED]</p> <p>6 [REDACTED]</p> <p>7 [REDACTED]</p> <p>8 [REDACTED]</p> <p>9 [REDACTED]</p> <p>10 [REDACTED]</p> <p>11 [REDACTED]</p> <p>12 [REDACTED]</p> <p>13 [REDACTED]</p> <p>14 [REDACTED]</p> <p>15 [REDACTED]</p> <p>16 [REDACTED]</p> <p>17 [REDACTED]</p> <p>18 [REDACTED]</p> <p>19 [REDACTED]</p> <p>20 [REDACTED]</p> <p>21 [REDACTED]</p> <p>22 [REDACTED]</p> <p>23 [REDACTED]</p> <p>24 [REDACTED]</p>	<p>Page 197</p> <p>1 [REDACTED]</p> <p>2 [REDACTED]</p> <p>3 [REDACTED]</p> <p>4 [REDACTED]</p> <p>5 [REDACTED]</p> <p>6 [REDACTED]</p> <p>7 [REDACTED]</p> <p>8 [REDACTED]</p> <p>9 [REDACTED]</p> <p>10 [REDACTED]</p> <p>11 [REDACTED]</p> <p>12 [REDACTED]</p> <p>13 [REDACTED]</p> <p>14 [REDACTED]</p> <p>15 [REDACTED]</p> <p>16 [REDACTED]</p> <p>17 [REDACTED]</p> <p>18 [REDACTED]</p> <p>19 [REDACTED]</p> <p>20 [REDACTED]</p> <p>21 [REDACTED]</p> <p>22 [REDACTED]</p> <p>23 [REDACTED]</p> <p>24 [REDACTED]</p>

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<p>Page 199</p> <p>1 [REDACTED]</p> <p>2 [REDACTED]</p> <p>3 [REDACTED]</p> <p>4 [REDACTED]</p> <p>5 [REDACTED]</p> <p>6 [REDACTED]</p> <p>7 [REDACTED]</p> <p>8 [REDACTED]</p> <p>9 [REDACTED]</p> <p>10 [REDACTED]</p> <p>11 [REDACTED]</p> <p>12 [REDACTED]</p> <p>13 [REDACTED]</p> <p>14 [REDACTED]</p> <p>15 [REDACTED]</p> <p>16 [REDACTED]</p> <p>17 [REDACTED]</p> <p>18 [REDACTED]</p> <p>19 [REDACTED]</p> <p>20 [REDACTED]</p> <p>21 [REDACTED]</p> <p>22 [REDACTED]</p> <p>23 [REDACTED]</p> <p>24 [REDACTED]</p>	<p>Page 201</p> <p>1 [REDACTED]</p> <p>2 [REDACTED]</p> <p>3 [REDACTED]</p> <p>4 [REDACTED]</p> <p>5 [REDACTED]</p> <p>6 [REDACTED]</p> <p>7 [REDACTED]</p> <p>8 [REDACTED]</p> <p>9 [REDACTED]</p> <p>10 [REDACTED]</p> <p>11 [REDACTED]</p> <p>12 [REDACTED]</p> <p>13 [REDACTED]</p> <p>14 [REDACTED]</p> <p>15 [REDACTED]</p> <p>16 [REDACTED]</p> <p>17 [REDACTED]</p> <p>18 [REDACTED]</p> <p>19 [REDACTED]</p> <p>20 [REDACTED]</p> <p>21 [REDACTED]</p> <p>22 [REDACTED]</p> <p>23 [REDACTED]</p> <p>24 [REDACTED]</p>

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<p style="text-align: right;">Page 202</p> <p>1 [REDACTED] 2 [REDACTED] 3 [REDACTED] 4 [REDACTED] 5 [REDACTED] 6 [REDACTED] 7 [REDACTED] 8 [REDACTED] 9 [REDACTED] 10 [REDACTED] 11 [REDACTED] 12 [REDACTED] 13 [REDACTED] 14 [REDACTED] 15 [REDACTED] 16 [REDACTED] 17 [REDACTED] 18 [REDACTED] 19 [REDACTED] 20 [REDACTED] 21 [REDACTED] 22 [REDACTED] 23 [REDACTED] 24 [REDACTED]</p>	<p style="text-align: right;">Page 204</p> <p>1 [REDACTED] 2 [REDACTED] 3 [REDACTED] 4 [REDACTED] 5 [REDACTED] 6 [REDACTED] 7 [REDACTED] 8 [REDACTED] 9 [REDACTED] 10 [REDACTED] 11 [REDACTED] 12 [REDACTED] 13 [REDACTED] 14 [REDACTED] 15 [REDACTED] 16 [REDACTED] 17 [REDACTED] 18 [REDACTED] 19 [REDACTED] 20 [REDACTED] 21 [REDACTED] 22 [REDACTED] 23 [REDACTED] 24 [REDACTED]</p>
<p style="text-align: right;">Page 203</p> <p>1 will use the Elmo. So I'd just 2 like -- to help us keep track of a 3 few things for the rest of the 4 afternoon, we're going to use the 5 Elmo. Hopefully, I can figure 6 this out. 7 And I'll hand you a copy of 8 it as well, but you'll be able to 9 see it on the Elmo. 10 We'll mark this as -- 11 MR. DAVIS: Another copy, 12 please. 13 MS. AMINOLROAYA: We'll turn 14 back to that in a moment. 15 BY MS. AMINOLROAYA: 16 [REDACTED] 17 [REDACTED] 18 [REDACTED] 19 [REDACTED] 20 [REDACTED] 21 [REDACTED] 22 [REDACTED] 23 [REDACTED] 24 [REDACTED]</p>	<p style="text-align: right;">Page 205</p> <p>1 BY MS. AMINOLROAYA: 2 [REDACTED] 3 [REDACTED] 4 [REDACTED] 5 [REDACTED] 6 [REDACTED] 7 [REDACTED] 8 [REDACTED] 9 He received payments, 10 correct? 11 A. Yes. Indirect has been 12 taken away. I was wondering what that 13 meant. 14 Q. We can put indirect back. 15 A. No, no. I thought you were 16 right taking it away, because I was going 17 to say I didn't know what indirect meant. 18 Q. Taking indirect away, as you 19 suggested. 20 And these programs were a 21 couple of hours, correct? 22 A. Correct. 23 Q. So I'll spare the -- I'd 24 like to listen to one of them, I'll spare</p>

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<p>1 the jury from listening to the full 2 presentation, but we'll play a portion of 3 Dr. Argoff and Dr. Ford's presentation at 4 one of the NIPC dinners, Advances in 5 Opioid Analgesia, Maximizing Benefit and 6 Minimizing Risks. 7 MR. DAVIS: You're going to 8 play a recording of the -- 9 MS. AMINOLROAYA: CME, yes. 10 MR. DAVIS: And you're just 11 going to play a portion of it, not 12 the entire thing? 13 MS. AMINOLROAYA: Yes. 14 MR. DAVIS: Are you going to 15 ask Ms. Kitlinski questions about 16 the portions you're about to play? 17 MS. AMINOLROAYA: Yes. 18 MR. DAVIS: I'm going to 19 object to Ms. Kitlinski answering 20 any questions about the portion of 21 a dinner dialogue, without 22 listening to the entire thing. 23 That's the same as showing her 24 about one page of a ten-page</p>	<p>1 And that's not going to be on the 2 record. So let's go off for a 3 second, please. 4 MR. BUCHANAN: Who's your 5 client? You work for Endo, not 6 for Ms. Kitlinski. 7 MR. DAVIS: I do work for 8 Ms. Kitlinski as well. 9 But let's -- we're going to 10 go off the record for this 11 conversation. 12 VIDEO TECHNICIAN: Going off 13 the record. The time is 2:02 p.m. 14 - - - 15 (Whereupon, a brief recess 16 was taken.) 17 - - - 18 VIDEO TECHNICIAN: We're 19 back on record. The time is 2:06 20 p.m. 21 MR. DAVIS: So prior to any 22 questioning about the excerpt or 23 snippet of whatever recording you 24 intend to play, I just want to</p>
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<p>1 document. She's got to have the 2 whole thing for the full context. 3 MR. BUCHANAN: I disagree, 4 counsel. Ms. Kitlinski attended 5 hours and hours of meetings. 6 She's not being asked for 7 everything that happened in hours 8 and hours of meetings. 9 MR. DAVIS: I don't know 10 what she's going to be asked about 11 and I don't know what the context 12 of what you're about to play is. 13 MR. BUCHANAN: You're 14 objection is noted. 15 MR. DAVIS: I don't know 16 what -- I'm not going to let Ms. 17 Kitlinski -- can we go off the 18 record for a second? 19 MR. BUCHANAN: No, it should 20 be on the record. 21 MS. AMINOLROAYA: It should 22 be on the record. 23 MR. DAVIS: I'd like to talk 24 to my client about this, if I may.</p>	<p>1 lodge an objection for the record. 2 We're going to permit Ms. 3 Kitlinski to answer questions, but 4 we think it's highly inappropriate 5 to be asking her questions about 6 just portions of some recording 7 that you're representing was a 8 recording from NIPC, some dinner 9 dialogue. It's no different than 10 asking her about a single page of 11 a ten-page document without 12 letting her review the entire 13 document. 14 So we think all of these 15 questions about this recording are 16 inappropriate, are objectionable. 17 But we're going to permit Ms. 18 Kitlinski to answer. 19 BY MS. AMINOLROAYA: 20  21 22 23 24</p>

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<p>Page 210</p> <p>1 [REDACTED]</p> <p>2 [REDACTED]</p> <p>3 [REDACTED]</p> <p>4 [REDACTED]</p> <p>5 [REDACTED]</p> <p>6 [REDACTED]</p> <p>7 [REDACTED]</p> <p>8 [REDACTED]</p> <p>9 [REDACTED]</p> <p>10 [REDACTED]</p> <p>11 [REDACTED]</p> <p>12 [REDACTED]</p> <p>13 [REDACTED]</p> <p>14 [REDACTED]</p> <p>15 [REDACTED]</p> <p>16 [REDACTED]</p> <p>17 [REDACTED]</p> <p>18 [REDACTED]</p> <p>19 [REDACTED]</p> <p>20 [REDACTED]</p> <p>21 [REDACTED]</p> <p>22 [REDACTED]</p> <p>23 [REDACTED]</p> <p>24 [REDACTED]</p>	<p>Page 212</p> <p>1 [REDACTED]</p> <p>2 [REDACTED]</p> <p>3 [REDACTED]</p> <p>4 [REDACTED]</p> <p>5 [REDACTED]</p> <p>6 [REDACTED]</p> <p>7 [REDACTED]</p> <p>8 A. Thank you.</p> <p>9 All right. I finished</p> <p>10 reading that.</p> <p>11 MS. AMINOLROAYA: The trial</p> <p>12 tech will play an excerpt of this</p> <p>13 dinner dialogue for us.</p> <p>14 (Whereupon, a video</p> <p>15 recording was played.)</p> <p>16 MR. DAVIS: Can you provide</p> <p>17 a time stamp, please, Mr. Trial</p> <p>18 Tech?</p> <p>19 MS. AMINOLROAYA: The first</p> <p>20 portion is from 0 to 14 seconds.</p> <p>21 TRIAL TECHNICIAN: This next</p> <p>22 portion will be from 1 minute and</p> <p>23 10 seconds to 1 minute and 18</p> <p>24 seconds.</p>
<p>Page 211</p> <p>1 [REDACTED]</p> <p>2 [REDACTED]</p> <p>3 [REDACTED]</p> <p>4 [REDACTED]</p> <p>5 [REDACTED]</p> <p>6 [REDACTED]</p> <p>7 [REDACTED]</p> <p>8 [REDACTED]</p> <p>9 [REDACTED]</p> <p>10 [REDACTED]</p> <p>11 [REDACTED]</p> <p>12 [REDACTED]</p> <p>13 [REDACTED]</p> <p>14 [REDACTED]</p> <p>15 [REDACTED]</p> <p>16 [REDACTED]</p> <p>17 [REDACTED]</p> <p>18 [REDACTED]</p> <p>19 [REDACTED]</p> <p>20 [REDACTED]</p> <p>21 [REDACTED]</p> <p>22 [REDACTED]</p> <p>23 [REDACTED]</p> <p>24 [REDACTED]</p>	<p>Page 213</p> <p>1 (Whereupon, the video</p> <p>2 recording was played.)</p> <p>3 - - -</p> <p>4 MS. AMINOLROAYA: The next</p> <p>5 portion of the tape is -- I'm</p> <p>6 sorry, go ahead, you have it.</p> <p>7 MR. KUNYS: The third</p> <p>8 portion is from 3 minutes and 40</p> <p>9 seconds to 3 minutes and 50</p> <p>10 seconds.</p> <p>11 (Whereupon, the video</p> <p>12 recording was played.)</p> <p>13 MR. KUNYS: And the fourth</p> <p>14 portion is from 17 minutes and 45</p> <p>15 seconds to 18 minutes and two</p> <p>16 seconds.</p> <p>17 (Whereupon, a video</p> <p>18 recording was played.)</p> <p>19 BY MS. AMINOLROAYA:</p> <p>20 [REDACTED]</p> <p>21 [REDACTED]</p> <p>22 [REDACTED]</p> <p>23 [REDACTED]</p> <p>24 [REDACTED]</p>





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<p>Page 215</p> <p>1 [REDACTED]</p> <p>2 [REDACTED]</p> <p>3 [REDACTED]</p> <p>4 [REDACTED]</p> <p>5 [REDACTED]</p> <p>6 [REDACTED]</p> <p>7 [REDACTED]</p> <p>8 [REDACTED]</p> <p>9 [REDACTED]</p> <p>10 [REDACTED]</p> <p>11 [REDACTED]</p> <p>12 [REDACTED]</p> <p>13 [REDACTED]</p> <p>14 [REDACTED]</p> <p>15 [REDACTED]</p> <p>16 [REDACTED]</p> <p>17 [REDACTED]</p> <p>18 [REDACTED]</p> <p>19 [REDACTED]</p> <p>20 [REDACTED]</p> <p>21 [REDACTED]</p> <p>22 [REDACTED]</p> <p>23 [REDACTED]</p> <p>24 [REDACTED]</p>	<p>Page 217</p> <p>1 [REDACTED]</p> <p>2 [REDACTED]</p> <p>3 [REDACTED]</p> <p>4 [REDACTED]</p> <p>5 [REDACTED]</p> <p>6 [REDACTED]</p> <p>7 [REDACTED]</p> <p>8 [REDACTED]</p> <p>9 [REDACTED]</p> <p>10 [REDACTED]</p> <p>11 [REDACTED]</p> <p>12 [REDACTED]</p> <p>13 [REDACTED]</p> <p>14 [REDACTED]</p> <p>15 [REDACTED]</p> <p>16 [REDACTED]</p> <p>17 [REDACTED]</p> <p>18 [REDACTED]</p> <p>19 [REDACTED]</p> <p>20 [REDACTED]</p> <p>21 [REDACTED]</p> <p>22 [REDACTED]</p> <p>23 [REDACTED]</p> <p>24 [REDACTED]</p>

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<p>Page 218</p> <p>1 2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23 24</p> 	<p>Page 220</p> <p>1 2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23 24</p> 
<p>Page 219</p> <p>1 2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23 24</p> 	<p>Page 221</p> <p>1 2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23 24</p> 




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Page 222	Page 224
<p>1 [REDACTED]</p> <p>2 [REDACTED]</p> <p>3 [REDACTED]</p> <p>4 [REDACTED]</p> <p>5 [REDACTED]</p> <p>6 [REDACTED]</p> <p>7 [REDACTED]</p> <p>8 [REDACTED]</p> <p>9 [REDACTED]</p> <p>10 MS. AMINOLROAYA: Can I get</p> <p>11 1304, please?</p> <p>12 I'm handing you what's been</p> <p>13 marked as Exhibit-24. It's E770.</p> <p>14 This is the evidence</p> <p>15 report/technology assessment,</p> <p>16 Number 218, The Effectiveness and</p> <p>17 Risks of Long-Term Opioid</p> <p>18 Treatment and Chronic Pain.</p> <p>19 Prepared by The Agency for</p> <p>20 Healthcare Research and Quality.</p> <p>21 - - -</p> <p>22 (Whereupon, Endo-Kitlinski</p> <p>23 Exhibit-24, No Bates, The</p> <p>24 Effectiveness and Risks of</p>	<p>1 Objectives. Chronic pain is common and</p> <p>2 use of long-term opioid therapy for</p> <p>3 chronic pain has increased dramatically.</p> <p>4 This report reviews the current evidence</p> <p>5 on effectiveness and harms of opioid</p> <p>6 therapy for chronic pain, focusing on</p> <p>7 long-term (longer than one year)</p> <p>8 outcomes.</p> <p>9 And to orient us, I should</p> <p>10 have mentioned this before, the bottom of</p> <p>11 Page 2 contains the date of September</p> <p>12 2014. And this was prepared for the</p> <p>13 Agency for Healthcare Research and</p> <p>14 Quality, U.S. Department of Health and</p> <p>15 Human Services, prepared by Pacific</p> <p>16 Northwest Evidence-Based Practice Center,</p> <p>17 Oregon Health and Science University.</p> <p>18 Did I read that correctly?</p> <p>19 A. Yes.</p> <p>20 Q. Now turning to Page 9.</p> <p>21 And the objective there, did</p> <p>22 I read that correctly before?</p> <p>23 I can read it one more time.</p> <p>24 It says, Chronic pain is common and use</p>
Page 223	Page 225
<p>1 Long-Term Opioid Treatment of</p> <p>2 Chronic Pain; Agency for</p> <p>3 Healthcare Research and</p> <p>4 Quality, was marked for</p> <p>5 identification.)</p> <p>6 MR. DAVIS: Just for the</p> <p>7 record, this doesn't appear to</p> <p>8 have a Bates number on it.</p> <p>9 MS. AMINOLROAYA: Correct.</p> <p>10 BY MS. AMINOLROAYA:</p> <p>11 Q. Ms. Kitlinski, are you</p> <p>12 familiar with The Agency for Healthcare</p> <p>13 Research and Quality, known as AHRQ?</p> <p>14 A. I'm familiar with that</p> <p>15 organization. And I'm familiar,</p> <p>16 generally, with this document. But I</p> <p>17 haven't read it in detail.</p> <p>18 Q. Okay. Let's turn to Page 33</p> <p>19 of the document -- actually, before we do</p> <p>20 that, let's turn to Page 9 at the top,</p> <p>21 770.9.</p> <p>22 It says, The Effectiveness</p> <p>23 and Risks of Long-Term Opioid Treatment</p> <p>24 of Chronic Pain. Structured abstract.</p>	<p>1 of long-term opioid therapy for chronic</p> <p>2 pain has increased dramatically. This</p> <p>3 report reviews the current evidence on</p> <p>4 effectiveness and harms of opioid therapy</p> <p>5 for chronic pain, focusing on long-term</p> <p>6 (longer than one year) outcomes.</p> <p>7 Did I read that correctly?</p> <p>8 A. Yes.</p> <p>9 Q. Turning to Page 33 of the</p> <p>10 document.</p> <p>11 It says, Discussion, key</p> <p>12 findings and strength of evidence.</p> <p>13 Second paragraph states, For</p> <p>14 effectiveness and comparative</p> <p>15 effectiveness, we identified no studies</p> <p>16 of long-term opioid therapy in patients</p> <p>17 with chronic pain versus no opioid</p> <p>18 therapy or nonopioid alternative</p> <p>19 therapies that evaluated outcomes at one</p> <p>20 year or longer. No studies examined how</p> <p>21 effectiveness varies based on various</p> <p>22 factors, including type of pain and pain</p> <p>23 characteristics.</p> <p>24 Did I read that correctly?</p>

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<p style="text-align: right;">Page 226</p> <p>1 A. Yes, you read that excerpt</p> <p>2 correctly.</p> <p>3 Q. And if we drop down to the</p> <p>4 first sentence of the last paragraph --</p> <p>5 A. Is there any reason we're</p> <p>6 kind of skipping around, as opposed to</p> <p>7 being able to read the -- since this is</p> <p>8 the key findings and strength of</p> <p>9 evidence, being able to read the entirety</p> <p>10 of it?</p> <p>11 Q. Sure. You can read whatever</p> <p>12 you'd like with your counsel.</p> <p>13 The last paragraph of this</p> <p>14 page, the first sentence states, No study</p> <p>15 assessed the risk of abuse, addiction or</p> <p>16 related outcomes associated with</p> <p>17 long-term opioid therapy use versus</p> <p>18 placebo or no opioid therapy.</p> <p>19 Did I read that correctly?</p> <p>20 MR. DAVIS: If you'd like to</p> <p>21 take time to read the context, you</p> <p>22 may.</p> <p>23 THE WITNESS: I'd like to</p> <p>24 read these two pages, at least.</p>	<p style="text-align: right;">Page 228</p> 
<p style="text-align: right;">Page 227</p> <p>1 BY MS. AMINOLROAYA:</p> <p>2 Q. Sure. Would you just answer</p> <p>3 my last question, if I read that last</p> <p>4 sentence correctly?</p> <p>5 A. Yes, you did read the words</p> <p>6 correctly.</p> <p>7 Q. Thank you.</p> <p>8 A. Thank you.</p> <p>9 Yeah, I'd like to just read</p> <p>10 the opening statement of this document</p> <p>11 and then the key --</p> <p>12 Q. Sure.</p> <p>13 A. -- key findings there.</p> <p>14 Q. Ms. Kitlinski, this is a</p> <p>15 very long document and I --</p> <p>16 A. No, I was just reading, as I</p> <p>17 said, the abstract and the results up</p> <p>18 front, as well as the key findings and</p> <p>19 summary of the strength of the evidence</p> <p>20 here.</p> <p>21 Q. Sure. So I'll tell you my</p> <p>22 question.</p> <p>23 A. Okay. Great.</p> <p>24 </p>	<p style="text-align: right;">Page 229</p> 


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<p>Page 230</p> <p>1 [REDACTED]</p> <p>2 [REDACTED]</p> <p>3 [REDACTED]</p> <p>4 [REDACTED]</p> <p>5 [REDACTED]</p> <p>6 [REDACTED]</p> <p>7 [REDACTED]</p> <p>8 [REDACTED]</p> <p>9 [REDACTED]</p> <p>10 [REDACTED]</p> <p>11 [REDACTED]</p> <p>12 [REDACTED]</p> <p>13 [REDACTED]</p> <p>14 [REDACTED]</p> <p>15 [REDACTED]</p> <p>16 [REDACTED]</p> <p>17 [REDACTED]</p> <p>18 [REDACTED]</p> <p>19 [REDACTED]</p> <p>20 [REDACTED]</p> <p>21 [REDACTED]</p> <p>22 [REDACTED]</p> <p>23 [REDACTED]</p> <p>24 [REDACTED]</p>	<p>Page 232</p> <p>1 [REDACTED]</p> <p>2 [REDACTED]</p> <p>3 [REDACTED]</p> <p>4 [REDACTED]</p> <p>5 [REDACTED]</p> <p>6 [REDACTED]</p> <p>7 [REDACTED]</p> <p>8 [REDACTED]</p> <p>9 [REDACTED]</p> <p>10 [REDACTED]</p> <p>11 [REDACTED]</p> <p>12 [REDACTED]</p> <p>13 [REDACTED]</p> <p>14 [REDACTED]</p> <p>15 [REDACTED]</p> <p>16 [REDACTED]</p> <p>17 [REDACTED]</p> <p>18 [REDACTED]</p> <p>19 [REDACTED]</p> <p>20 [REDACTED]</p> <p>21 [REDACTED]</p> <p>22 [REDACTED]</p> <p>23 [REDACTED]</p> <p>24 [REDACTED]</p>
<p>Page 231</p> <p>1 [REDACTED]</p> <p>2 [REDACTED]</p> <p>3 [REDACTED]</p> <p>4 [REDACTED]</p> <p>5 [REDACTED]</p> <p>6 [REDACTED]</p> <p>7 [REDACTED]</p> <p>8 [REDACTED]</p> <p>9 [REDACTED]</p> <p>10 [REDACTED]</p> <p>11 [REDACTED]</p> <p>12 [REDACTED]</p> <p>13 [REDACTED]</p> <p>14 [REDACTED]</p> <p>15 [REDACTED]</p> <p>16 [REDACTED]</p> <p>17 [REDACTED]</p> <p>18 [REDACTED]</p> <p>19 [REDACTED]</p> <p>20 [REDACTED]</p> <p>21 [REDACTED]</p> <p>22 [REDACTED]</p> <p>23 [REDACTED]</p> <p>24 [REDACTED]</p>	<p>Page 233</p> <p>1 [REDACTED]</p> <p>2 [REDACTED]</p> <p>3 [REDACTED]</p> <p>4 [REDACTED]</p> <p>5 [REDACTED]</p> <p>6 [REDACTED]</p> <p>7 [REDACTED]</p> <p>8 [REDACTED]</p> <p>9 [REDACTED]</p> <p>10 [REDACTED]</p> <p>11 [REDACTED]</p> <p>12 [REDACTED]</p> <p>13 [REDACTED]</p> <p>14 [REDACTED]</p> <p>15 [REDACTED]</p> <p>16 [REDACTED]</p> <p>17 [REDACTED]</p> <p>18 [REDACTED]</p> <p>19 [REDACTED]</p> <p>20 [REDACTED]</p> <p>21 MR. DAVIS: It's been about</p> <p>22 an hour. Why don't we take</p> <p>23 another quick break? Five minutes</p> <p>24 or so.</p>

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<p style="text-align: right;">Page 234</p> <p>1 THE WITNESS: That would be</p> <p>2 great.</p> <p>3 MS. AMINOLROAYA: That's</p> <p>4 fine.</p> <p>5 VIDEO TECHNICIAN: Going off</p> <p>6 the record. The time is 2:32 p.m.</p> <p>7 - - -</p> <p>8 (Whereupon, a brief recess</p> <p>9 was taken.)</p> <p>10 - - -</p> <p>11 VIDEO TECHNICIAN: Back on</p> <p>12 record at 2:48 p.m.</p> <p>13 BY MS. AMINOLROAYA:</p> <p>14 Q. Ms. Kitlinski, welcome back.</p> <p>15 We just took a short break.</p> <p>16 A. Thank you.</p> <p>17 Q. And you had just testified</p> <p>18 that you recalled the newsletter that</p> <p>19 NIPC put out, correct?</p> <p>20 A. Yes, I said that I do recall</p> <p>21 there was a newsletter. I did not</p> <p>22 recall -- you mentioned the title of it,</p> <p>23 and I don't know that.</p> <p>24 MS. AMINOLROAYA: I'm</p>	<p style="text-align: right;">Page 236</p> <p>1 Q. And if you turn to Page 4 of</p> <p>2 the document with me, you'll see a page</p> <p>3 entitled, Key Terms for Opioid</p> <p>4 Analgesics.</p> <p>5 And if you look in the</p> <p>6 right-hand column there, you see the term</p> <p>7 pseudoaddiction. It says,</p> <p>8 Pseudoaddiction refers to behaviors that</p> <p>9 might seem aberrant, but actually</p> <p>10 indicate inadequate treatment of pain.</p> <p>11 The behaviors resolve when the pain</p> <p>12 medication is increased and appropriate</p> <p>13 analgesia is obtained.</p> <p>14 Did I read that correctly?</p> <p>15 A. Yes.</p> <p>16 Q. So the NIPC management</p> <p>17 newsletters were -- included key terms</p> <p>18 for opioid such as pseudoaddiction?</p> <p>19 MR. DAVIS: Objection to</p> <p>20 form.</p> <p>21 THE WITNESS: The key terms</p> <p>22 that they included -- as you can</p> <p>23 see up front, the first one was</p> <p>24 addiction. So that was put in</p>
<p style="text-align: right;">Page 235</p> <p>1 handing you what's been marked</p> <p>2 Exhibit-25. It's</p> <p>3 ENDO-OPIOID_MDL-01605952. It's</p> <p>4 E690.</p> <p>5 - - -</p> <p>6 (Whereupon, Endo-Kitlinski</p> <p>7 Exhibit-25,</p> <p>8 ENDO-OPIOID_MDL-01605952-958, was</p> <p>9 marked for identification.)</p> <p>10 - - -</p> <p>11 BY MS. AMINOLROAYA:</p> <p>12 Q. This is --</p> <p>13 A. Pain Management Today.</p> <p>14 Q. -- Pain Management Today.</p> <p>15 It sounds like you recognize</p> <p>16 it?</p> <p>17 A. Yes. Now I do.</p> <p>18 Q. Great. And is the faculty</p> <p>19 advisor here Dr. Argoff?</p> <p>20 A. Correct.</p> <p>21 Q. And this is -- you can see</p> <p>22 the copyright date is 2001, correct?</p> <p>23 Just below Dr. Argoff's photo.</p> <p>24 A. Yes.</p>	<p style="text-align: right;">Page 237</p> <p>1 appropriate context.</p> <p>2 And then physical</p> <p>3 dependence, tolerance and</p> <p>4 pseudoaddiction.</p> <p>5 MS. AMINOLROAYA: 304,</p> <p>6 please.</p> <p>7 BY MS. AMINOLROAYA:</p> <p>8 </p> <p>9</p> <p>10</p> <p>11</p> <p>12</p> <p>13</p> <p>14</p> <p>15</p> <p>16</p> <p>17</p> <p>18</p> <p>19</p> <p>20</p> <p>21</p> <p>22</p> <p>23</p> <p>24</p>





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<p style="text-align: right;">Page 263</p> <p>1 BY MS. AMINOLROAYA:</p> <p>2 Q. You can see at the bottom of</p> <p>3 the document -- the source of this is the</p> <p>4 National Center for Health Statistics,</p> <p>5 National Vital Statistic System,</p> <p>6 mortality data, and it provides a link</p> <p>7 there to the CDC.gov.</p> <p>8 [REDACTED]</p> <p>9 [REDACTED]</p> <p>10 [REDACTED]</p> <p>11 [REDACTED]</p> <p>12 [REDACTED]</p> <p>13 [REDACTED]</p> <p>14 [REDACTED]</p> <p>15 [REDACTED]</p> <p>16 [REDACTED]</p> <p>17 [REDACTED]</p> <p>18 [REDACTED]</p> <p>19 [REDACTED]</p> <p>20 [REDACTED]</p> <p>21 [REDACTED]</p> <p>22 document. And I may use the Elmo for</p> <p>23 this.</p> <p>24 [REDACTED]</p>	<p style="text-align: right;">Page 265</p> <p>1 2016, National Center for Health</p> <p>2 Statistics.</p> <p>3 This is reflecting adjusted</p> <p>4 age related to death for drug appointing</p> <p>5 mortality.</p> <p>6 And you would agree that the</p> <p>7 chart goes from blue, and then the number</p> <p>8 of deaths go up as the colors change to</p> <p>9 yellow, for example, and red?</p> <p>10 A. So just a question, because</p> <p>11 I'm not familiar with this -- and I know</p> <p>12 you usually ask me if that was correct --</p> <p>13 it was 1999, not '96.</p> <p>14 Q. Thank you for that</p> <p>15 correction.</p> <p>16 A. Not a big issue. I just</p> <p>17 wanted to, since I'm testifying, be</p> <p>18 accurate.</p> <p>19 So I don't -- I'm not</p> <p>20 familiar with this chart, and I do not</p> <p>21 understand the -- so while it says that</p> <p>22 the source is the National Center for</p> <p>23 Health Statistics, National Vital</p> <p>24 Statistics System, mortality data, and it</p>

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<p style="text-align: right;">Page 266</p> <p>1 refers further to drug poisoning</p> <p>2 mortality, it doesn't specify what drugs</p> <p>3 we're talking about.</p> <p>4 Are these all drugs? Are</p> <p>5 these opioids? Are these prescription</p> <p>6 opioids? Are they -- does it include</p> <p>7 barbiturates, for example? I just don't</p> <p>8 know what this is.</p> <p>9 Q. So let's compare the 2001</p> <p>10 map to the 2012 map.</p> <p>11 Would you agree there is a</p> <p>12 lot of blue in the 2001 map?</p> <p>13 A. Yes.</p> <p>14 MR. DAVIS: Objection to</p> <p>15 form.</p> <p>16 BY MS. AMINOLROAYA:</p> <p>17 Q. And do you see less blue in</p> <p>18 the 2012 map?</p> <p>19 MR. DAVIS: Objection to</p> <p>20 form.</p> <p>21 BY MS. AMINOLROAYA:</p> <p>22 Q. Page 14.</p> <p>23 A. And you asked me do I see</p> <p>24 less --</p>	<p style="text-align: right;">Page 268</p> <p>1 death rate per 100,000.</p> <p>2 But we don't know death rate</p> <p>3 from what.</p> <p>4 BY MS. AMINOLROAYA:</p> <p>5 Q. And do you see more yellow</p> <p>6 and more orange and more red in 2012?</p> <p>7 MR. DAVIS: Objection to</p> <p>8 form.</p> <p>9 THE WITNESS: Well, strictly</p> <p>10 from a color perspective, the map</p> <p>11 from 2001 has more blue on it and</p> <p>12 less red and yellow, as you just</p> <p>13 stated, than the map from 2012.</p> <p>14 But, again, what that refers</p> <p>15 to and what the data is, is not</p> <p>16 clear from this. And I'm not</p> <p>17 familiar with it, so I don't want</p> <p>18 to speculate.</p> <p>19 BY MS. AMINOLROAYA:</p> <p>20 Q. And that's the same time you</p> <p>21 were running the NIPC program, correct?</p> <p>22 MR. DAVIS: Objection to</p> <p>23 form.</p> <p>24 THE WITNESS: The NIPC</p>
<p style="text-align: right;">Page 267</p> <p>1 Q. Do you see less of the color</p> <p>2 blue in the 2012 map?</p> <p>3 MR. DAVIS: Objection to</p> <p>4 form.</p> <p>5 THE WITNESS: Again, there</p> <p>6 is -- there is less blue on this</p> <p>7 map. But I don't -- still don't</p> <p>8 understand particularly what</p> <p>9 the -- what it is we're talking</p> <p>10 about here, what mortality data,</p> <p>11 what drug poisoning mortality data</p> <p>12 we're referencing.</p> <p>13 BY MS. AMINOLROAYA:</p> <p>14 Q. And the color bar on the</p> <p>15 right side here tells us that yellow</p> <p>16 means deaths are up from 2 to 14 per</p> <p>17 100,000 people. And red means that</p> <p>18 deaths are up from 2, for blue, to 26 or</p> <p>19 more per 100,000 people, correct?</p> <p>20 MR. DAVIS: Objection to</p> <p>21 form.</p> <p>22 THE WITNESS: Well, again, I</p> <p>23 can see what the legend on the map</p> <p>24 states, estimated age-adjusted</p>	<p style="text-align: right;">Page 269</p> <p>1 program was being conducted on</p> <p>2 appropriate pain management, which</p> <p>3 included opioids but was not 100</p> <p>4 percent focused on opioids. It</p> <p>5 included neuropathic pain and</p> <p>6 chronic pain. And it did occur</p> <p>7 during that time period.</p> <p>8 BY MS. AMINOLROAYA:</p> <p>9 Q. Thank you.</p> <p>10 </p> <p>11</p> <p>12</p> <p>13</p> <p>14</p> <p>15</p> <p>16</p> <p>17</p> <p>18</p> <p>19</p> <p>20</p> <p>21</p> <p>22</p> <p>23</p> <p>24</p>

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<p>Page 271</p> <p>1 2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23 24</p> 	<p>Page 273</p> <p>1 2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23 24</p> 

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<p>Page 279</p> <div><div>1</div><div>2</div><div>3</div><div>4</div><div>5</div><div>6</div><div>7</div><div>8</div><div>9</div><div>10</div><div>11</div><div>12</div><div>13</div><div>14</div><div>15</div><div>16</div><div>17</div><div>18</div><div>19</div><div>20</div><div>21</div><div>22</div><div>23</div><div>24</div></div>	<p>Page 281</p> <div><div>1</div><div>2</div><div>3</div><div>4</div><div>5</div><div>6</div><div>7</div><div>8</div><div>9</div><div>10</div><div>11</div><div>12</div><div>13</div><div>14</div><div>15</div><div>16</div><div>17</div><div>18</div><div>19</div><div>20</div><div>21</div><div>22</div><div>23</div><div>24</div></div>

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<p style="text-align: right;">Page 282</p> <p>1 [REDACTED] 2 [REDACTED] 3 [REDACTED] 4 [REDACTED] 5 [REDACTED] 6 [REDACTED] 7 [REDACTED] 8 [REDACTED] 9 [REDACTED] 10 [REDACTED] 11 [REDACTED] 12 [REDACTED] 13 [REDACTED] 14 [REDACTED] 15 [REDACTED] 16 [REDACTED] 17 [REDACTED] 18 [REDACTED] 19 [REDACTED] 20 [REDACTED] 21 [REDACTED] 22 [REDACTED] 23 [REDACTED] 24 [REDACTED]</p>	<p style="text-align: right;">Page 284</p> <p>1 [REDACTED] 2 [REDACTED] 3 [REDACTED] 4 [REDACTED] 5 [REDACTED] 6 [REDACTED] 7 [REDACTED] 8 [REDACTED] 9 [REDACTED] 10 [REDACTED] 11 [REDACTED] 12 I'm going to instruct you not to 13 answer my questions on this 14 document that we're going to claw 15 back as attorney work product. 16 This is information that was 17 gathered at the request of 18 attorneys in responding to the 19 Senate Finance Committee. So I'm 20 going to instruct you not to 21 answer any questions about that. 22 And I'd like to claw this document 23 back, if we could. Exhibit-34, 24 just so the record is clear.</p>
<p style="text-align: right;">Page 283</p> <p>1 [REDACTED] 2 [REDACTED] 3 [REDACTED] 4 [REDACTED] 5 [REDACTED] 6 [REDACTED] 7 [REDACTED] 8 [REDACTED] 9 [REDACTED] 10 [REDACTED] 11 [REDACTED] 12 [REDACTED] 13 [REDACTED] 14 [REDACTED] 15 [REDACTED] 16 [REDACTED] 17 [REDACTED] 18 [REDACTED] 19 [REDACTED] 20 [REDACTED] 21 [REDACTED] 22 [REDACTED] 23 [REDACTED] 24 [REDACTED]</p>	<p style="text-align: right;">Page 285</p> <p>1 MR. BUCHANAN: Counsel, can 2 you just state more specific 3 reasons? I don't have it in front 4 of me. Are counsel identified? 5 MR. DAVIS: Counsel are not 6 identified by it. But I was 7 counsel, and I know what -- who 8 was directing these individuals to 9 collect this information and the 10 purposes for which that 11 information was being collected. 12 And the fact that it was 13 counsel directing these 14 individuals to collect this 15 information protects it from 16 disclosure because of the work 17 product protection. 18 MS. AMINOLROAYA: This 19 information was disclosed in your 20 June 15th disclosure to the Senate 21 Finance Committee. 22 MR. DAVIS: It was, indeed. 23 And you have that information 24 there, and the information that</p>

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<p style="text-align: right;">Page 286</p> <p>1 was disclosed is fine. But the</p> <p>2 information as collected by these</p> <p>3 individuals specifically here, I</p> <p>4 don't know if there are</p> <p>5 differences, but this was</p> <p>6 information provided -- collected</p> <p>7 by these individuals and provided</p> <p>8 to attorneys so the attorneys</p> <p>9 could provide legal advice to the</p> <p>10 company, and is, therefore, work</p> <p>11 product.</p> <p>12 MR. BUCHANAN: I'm not sure</p> <p>13 how it couldn't be a waiver, if it</p> <p>14 was provided to the Senate as you</p> <p>15 just said.</p> <p>16 MR. DAVIS: I mean, if it's</p> <p>17 exactly the same as what we</p> <p>18 provided to the Senate, perhaps.</p> <p>19 But I don't want to sit</p> <p>20 here -- we can sit here and go</p> <p>21 through it if you want. I don't</p> <p>22 know if this is exactly what we</p> <p>23 provided to the Senate or if there</p> <p>24 are any changes.</p>	<p style="text-align: right;">Page 288</p> <p>1 MS. AMINOLROAYA: She</p> <p>2 testified before --</p> <p>3 MR. DAVIS: Ms. Kitlinski's</p> <p>4 work collecting the information</p> <p>5 that was provided to the Senate</p> <p>6 Finance Committee was directed by</p> <p>7 attorneys, provided to attorneys</p> <p>8 so they could provide legal advice</p> <p>9 to the company.</p> <p>10 MS. AMINOLROAYA: That's the</p> <p>11 same as Ms. Kitlinski gathering</p> <p>12 documents subject to advice that</p> <p>13 she needed to respond to a</p> <p>14 subpoena.</p> <p>15 MR. DAVIS: You asked the</p> <p>16 specifics of what she was</p> <p>17 gathering. That's not the same as</p> <p>18 her gathering documents to respond</p> <p>19 to a subpoena.</p> <p>20 I don't think she -- that</p> <p>21 wasn't done so we could provide</p> <p>22 legal advice to the company. That</p> <p>23 was done to be responsive to the</p> <p>24 subpoena you sent her.</p>
<p style="text-align: right;">Page 287</p> <p>1 MR. BUCHANAN: I'm sure we</p> <p>2 can take a break in a moment.</p> <p>3 Maybe you can just take a look at</p> <p>4 it, so we don't have to needlessly</p> <p>5 have a privilege challenge. It</p> <p>6 might not be that controversial.</p> <p>7 We'll agree it's not a</p> <p>8 subject matter.</p> <p>9 MR. DAVIS: What's that?</p> <p>10 MR. BUCHANAN: We'll agree</p> <p>11 that examination on this would not</p> <p>12 be a broader waiver.</p> <p>13 MR. DAVIS: Fair. I'll take</p> <p>14 a look at it when we're on a</p> <p>15 break.</p> <p>16 BY MS. AMINOLROAYA:</p> <p>17 Q. So, Ms. Kitlinski, you had</p> <p>18 responsibility for identifying some of</p> <p>19 the information that went into the Senate</p> <p>20 Finance Committee?</p> <p>21 MR. DAVIS: I'm going to</p> <p>22 object to that as well as</p> <p>23 protected by the work product</p> <p>24 protection.</p>	<p style="text-align: right;">Page 289</p> <p>1 BY MS. AMINOLROAYA:</p> <p>2 </p> <p>3 </p> <p>4 </p> <p>5 </p> <p>6 </p> <p>7 </p> <p>8 </p> <p>9 </p> <p>10 </p> <p>11 </p> <p>12 </p> <p>13 </p> <p>14 </p> <p>15 </p> <p>16 </p> <p>17 </p> <p>18 </p> <p>19 </p> <p>20 </p> <p>21 </p> <p>22 </p> <p>23 </p> <p>24 </p>

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<div>Page 299</div> <div><div>1</div><div>2</div><div>3</div><div>4</div><div>5</div><div>6</div><div>7</div><div>8</div><div>9</div><div>10</div><div>11</div><div>12</div><div>13</div><div>14</div><div>15</div><div>16</div><div>17</div><div>18</div><div>19</div><div>20</div><div>21</div><div>22</div><div>23</div><div>24</div></div>	<div>Page 301</div> <div><div>1</div><div>2</div><div>3</div><div>4</div><div>5</div><div>6</div><div>7</div><div>8</div><div>9</div><div>10</div><div>11</div><div>12</div><div>13</div><div>14</div><div>15</div><div>16</div><div>17</div><div>18</div><div>19</div><div>20</div><div>21</div><div>22</div><div>23</div><div>24</div></div>

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<p>Page 302</p> <p>1 [REDACTED]</p> <p>2 [REDACTED]</p> <p>3 [REDACTED]</p> <p>4 [REDACTED]</p> <p>5 [REDACTED]</p> <p>6 [REDACTED]</p> <p>7 [REDACTED]</p> <p>8 [REDACTED]</p> <p>9 [REDACTED]</p> <p>10 [REDACTED]</p> <p>11 [REDACTED]</p> <p>12 [REDACTED]</p> <p>13 [REDACTED]</p> <p>14 [REDACTED]</p> <p>15 [REDACTED]</p> <p>16 [REDACTED]</p> <p>17 [REDACTED]</p> <p>18 [REDACTED]</p> <p>19 [REDACTED]</p> <p>20 [REDACTED]</p> <p>21 [REDACTED]</p> <p>22 [REDACTED]</p> <p>23 [REDACTED]</p> <p>24 [REDACTED]</p>	<p>Page 304</p> <p>1 rarely cause addiction. Morphine and</p> <p>2 similar pain medications called opioids</p> <p>3 can be highly effective for certain</p> <p>4 conditions. Unless you have a history of</p> <p>5 substance abuse, there is little risk of</p> <p>6 addiction when these medications are</p> <p>7 properly prescribed by a doctor and taken</p> <p>8 as directed.</p> <p>9 Did I read that correctly?</p> <p>10 A. Yes, that's what it states</p> <p>11 here.</p> <p>12 Q. And this was the material</p> <p>13 that was put out by the American Pain</p> <p>14 Foundation, correct?</p> <p>15 A. Again, what is the date on</p> <p>16 this? Do you have that here somewhere?</p> <p>17 [REDACTED]</p> <p>18 [REDACTED]</p> <p>19 [REDACTED]</p> <p>20 [REDACTED]</p> <p>21 [REDACTED]</p> <p>22 [REDACTED]</p> <p>23 [REDACTED]</p> <p>24 [REDACTED]</p>
<p>Page 303</p> <p>1 [REDACTED]</p> <p>2 [REDACTED]</p> <p>3 [REDACTED]</p> <p>4 [REDACTED]</p> <p>5 [REDACTED]</p> <p>6 [REDACTED]</p> <p>7 [REDACTED]</p> <p>8 [REDACTED]</p> <p>9 [REDACTED]</p> <p>10 [REDACTED]</p> <p>11 [REDACTED]</p> <p>12 [REDACTED]</p> <p>13 [REDACTED]</p> <p>14 please. I'm handing you what's</p> <p>15 been marked as Exhibit-36. This</p> <p>16 is CHI_0004335580, and it's E1337.</p> <p>17 - - -</p> <p>18 (Whereupon, Endo-Kitlinski</p> <p>19 Exhibit-36, CHI_000435580-597, was</p> <p>20 marked for identification.)</p> <p>21 - - -</p> <p>22 BY MS. AMINOLROAYA:</p> <p>23 Q. And if we go to Page 9 of</p> <p>24 the document, it states, Pain medications</p>	<p>Page 305</p> <p>1 [REDACTED]</p> <p>2 [REDACTED]</p> <p>3 [REDACTED]</p> <p>4 [REDACTED]</p> <p>5 [REDACTED]</p> <p>6 [REDACTED]</p> <p>7 [REDACTED]</p> <p>8 [REDACTED]</p> <p>9 [REDACTED]</p> <p>10 [REDACTED]</p> <p>11 [REDACTED]</p> <p>12 [REDACTED]</p> <p>13 [REDACTED]</p> <p>14 strike everything after the</p> <p>15 word -- well, move to strike that</p> <p>16 entire answer.</p> <p>17 MR. DAVIS: We've been going</p> <p>18 over an hour. Can we take a quick</p> <p>19 break?</p> <p>20 MS. AMINOLROAYA: Sure.</p> <p>21 VIDEO TECHNICIAN: Going off</p> <p>22 the record. The time is 3:58 p.m.</p> <p>23 - - -</p> <p>24 (Whereupon, a brief recess</p>





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<p>Page 306</p> <p>1 was taken.)</p> <p>2 - - -</p> <p>3 VIDEO TECHNICIAN: We are</p> <p>4 back on the record. The time is</p> <p>5 4:16 p.m.</p> <p>6 BY MS. AMINOLROAYA:</p> <p>7 [REDACTED]</p> <p>8 [REDACTED]</p> <p>9 [REDACTED]</p> <p>10 [REDACTED]</p> <p>11 [REDACTED]</p> <p>12 [REDACTED]</p> <p>13 [REDACTED]</p> <p>14 [REDACTED]</p> <p>15 [REDACTED]</p> <p>16 [REDACTED]</p> <p>17 [REDACTED]</p> <p>18 [REDACTED]</p> <p>19 [REDACTED]</p> <p>20 [REDACTED]</p> <p>21 [REDACTED]</p> <p>22 [REDACTED]</p> <p>23 [REDACTED]</p> <p>24 [REDACTED]</p>	<p>Page 308</p> <p>1 [REDACTED]</p> <p>2 [REDACTED]</p> <p>3 [REDACTED]</p> <p>4 [REDACTED]</p> <p>5 [REDACTED]</p> <p>6 [REDACTED]</p> <p>7 [REDACTED]</p> <p>8 [REDACTED]</p> <p>9 [REDACTED]</p> <p>10 [REDACTED]</p> <p>11 [REDACTED]</p> <p>12 [REDACTED]</p> <p>13 [REDACTED]</p> <p>14 [REDACTED]</p> <p>15 [REDACTED]</p> <p>16 [REDACTED]</p> <p>17 [REDACTED]</p> <p>18 [REDACTED]</p> <p>19 [REDACTED]</p> <p>20 [REDACTED]</p> <p>21 [REDACTED]</p> <p>22 [REDACTED]</p> <p>23 [REDACTED]</p> <p>24 [REDACTED]</p>
<p>Page 307</p> <p>1 [REDACTED]</p> <p>2 [REDACTED]</p> <p>3 [REDACTED]</p> <p>4 [REDACTED]</p> <p>5 [REDACTED]</p> <p>6 [REDACTED]</p> <p>7 [REDACTED]</p> <p>8 [REDACTED]</p> <p>9 [REDACTED]</p> <p>10 [REDACTED]</p> <p>11 [REDACTED]</p> <p>12 [REDACTED]</p> <p>13 [REDACTED]</p> <p>14 [REDACTED]</p> <p>15 [REDACTED]</p> <p>16 [REDACTED]</p> <p>17 [REDACTED]</p> <p>18 [REDACTED]</p> <p>19 [REDACTED]</p> <p>20 [REDACTED]</p> <p>21 [REDACTED]</p> <p>22 [REDACTED]</p> <p>23 [REDACTED]</p> <p>24 [REDACTED]</p>	<p>Page 309</p> <p>1 [REDACTED]</p> <p>2 [REDACTED]</p> <p>3 [REDACTED]</p> <p>4 [REDACTED]</p> <p>5 [REDACTED]</p> <p>6 [REDACTED]</p> <p>7 [REDACTED]</p> <p>8 [REDACTED]</p> <p>9 [REDACTED]</p> <p>10 [REDACTED]</p> <p>11 [REDACTED]</p> <p>12 [REDACTED]</p> <p>13 [REDACTED]</p> <p>14 [REDACTED]</p> <p>15 [REDACTED]</p> <p>16 [REDACTED]</p> <p>17 [REDACTED]</p> <p>18 [REDACTED]</p> <p>19 [REDACTED]</p> <p>20 [REDACTED]</p> <p>21 [REDACTED]</p> <p>22 [REDACTED]</p> <p>23 [REDACTED]</p> <p>24 [REDACTED]</p>





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<p>Page 311</p> <p>1 2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23 24</p> 	<p>Page 313</p> <p>1 2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23 24</p> 

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<p>Page 315</p> <p>1 2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23 24</p> 	<p>Page 317</p> <p>1 2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23 24</p> 



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<p>Page 319</p> <p>1 [REDACTED]</p> <p>2 [REDACTED]</p> <p>3 [REDACTED]</p> <p>4 [REDACTED]</p> <p>5 [REDACTED]</p> <p>6 [REDACTED]</p> <p>7 [REDACTED]</p> <p>8 [REDACTED]</p> <p>9 [REDACTED]</p> <p>10 [REDACTED]</p> <p>11 [REDACTED]</p> <p>12 [REDACTED]</p> <p>13 [REDACTED]</p> <p>14 [REDACTED]</p> <p>15 [REDACTED]</p> <p>16 [REDACTED]</p> <p>17 [REDACTED]</p> <p>18 [REDACTED]</p> <p>19 [REDACTED]</p> <p>20 [REDACTED]</p> <p>21 [REDACTED]</p> <p>22 [REDACTED]</p> <p>23 [REDACTED]</p> <p>24 [REDACTED]</p>	<p>Page 321</p> <p>1 [REDACTED]</p> <p>2 [REDACTED]</p> <p>3 [REDACTED]</p> <p>4 [REDACTED]</p> <p>5 [REDACTED]</p> <p>6 [REDACTED]</p> <p>7 [REDACTED]</p> <p>8 [REDACTED]</p> <p>9 [REDACTED]</p> <p>10 [REDACTED]</p> <p>11 [REDACTED]</p> <p>12 [REDACTED]</p> <p>13 [REDACTED]</p> <p>14 [REDACTED]</p> <p>15 [REDACTED]</p> <p>16 [REDACTED]</p> <p>17 [REDACTED]</p> <p>18 [REDACTED]</p> <p>19 [REDACTED]</p> <p>20 [REDACTED]</p> <p>21 [REDACTED]</p> <p>22 [REDACTED]</p> <p>23 [REDACTED]</p> <p>24 [REDACTED]</p>

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<p>Page 323</p> <p>1 2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23 24</p> 	<p>Page 325</p> <p>1 2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23 24</p> 

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 13 [REDACTED]
 14 [REDACTED]
 15 [REDACTED]
 16 [REDACTED]
 17 [REDACTED]
 18 [REDACTED]
 19 [REDACTED]
 20 Q. You're not a doctor, right,
 21 Ms. Kitlinski?
 22 A. No, I'm not.
 23 MS. AMINOLROAYA: I'm
 24 handing you what's been marked as

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1 American Pain Society's website entitled,
 2 2017 Elizabeth Narcessian Award For
 3 Outstanding Educational Achievements in
 4 the Field of Pain. And we have a picture
 5 of you there.
 6 A. Yes.
 7 Q. And the third -- the third
 8 paragraph there states, Ms. Kitlinski is
 9 a strong proponent of utilizing
 10 innovative partnerships/learning
 11 approaches. She was instrumental in
 12 establishing APS's interdisciplinary
 13 fundamentals of pain management course,
 14 which has provided over 1,150
 15 residents/fellows with mentored exposure
 16 to the annual scientific meeting and a
 17 solid foundation for continued learning
 18 on pain assessment/management.
 19 Did I read that correctly?
 20 A. Yes.

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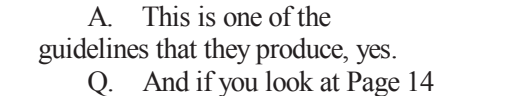
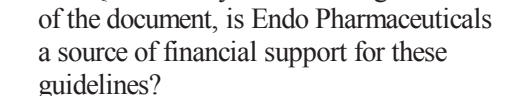
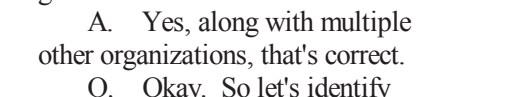
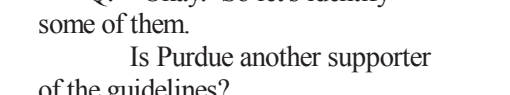
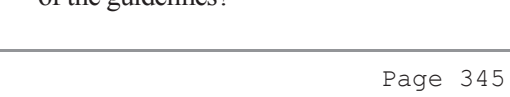
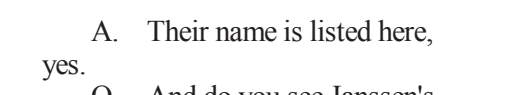
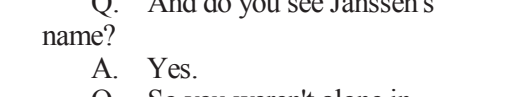
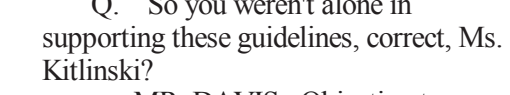















1 E1300.
 2 - - -
 3 (Whereupon, Endo-Kitlinski
 4 Exhibit-41, No Bates, American
 5 Pain Society; 2017 Elizabeth
 6 Narcessian Award for Outstanding
 7 Educational Achievements in the
 8 Field of Pain, was marked for
 9 identification.)
 10 - - -
 11 BY MS. AMINOLROAYA:
 12 Q. In fact, you won an award
 13 for your work with the American Pain
 14 Society residents program; is that
 15 correct?
 16 A. I won an award for
 17 innovation in pain education. That
 18 was -- that is awarded annually by the
 19 American Pain Society to someone who they
 20 believe has made a contribution, a
 21 valuable contribution, to the field of
 22 pain assessment and management.
 23 Q. I'm handing you E1300.
 24 It's a printout from the

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 16 [REDACTED]
 17 [REDACTED]
 18 [REDACTED]
 19 [REDACTED]
 20 [REDACTED]
 21 [REDACTED]
 22 [REDACTED]
 23 [REDACTED]
 24 A. No, I don't recall that we


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<p style="text-align: right;">Page 342</p> <p>1 looked at the document, quite frankly. 2 Q. We'll get that for you in a 3 moment. 4 MS. AMINOLROAYA: I'm 5 handing you what has been marked 6 as Exhibit-42. This is 7 PKY181215547. And it's E1406. 8 - - - 9 (Whereupon, Endo-Kitlinski 10 Exhibit-42, PKY181215547-749, was 11 marked for identification.) 12 - - - 13 THE WITNESS: Thank you. 14 Yes, we definitely did not 15 look at this. 16 BY MS. AMINOLROAYA: 17 Q. Oh, no, this was not the 18 document I was referring to, sorry. 19 We're pulling it up. 20 And this document is the 21 Guideline for the Management of Pain in 22 Osteoarthritis, Rheumatoid Arthritis and 23 Juvenile Chronic Arthritis, second 24 edition.</p>	<p style="text-align: right;">Page 344</p> <p>1  2  3  4  5  6  7  8  9  10  11 guideline from the American Pain Society; 12 is that correct? 13 A. This is one of the 14 guidelines that they produce, yes. 15 Q. And if you look at Page 14 16 of the document, is Endo Pharmaceuticals 17 a source of financial support for these 18 guidelines? 19 A. Yes, along with multiple 20 other organizations, that's correct. 21 Q. Okay. So let's identify 22 some of them. 23 Is Purdue another supporter 24 of the guidelines?</p>
<p style="text-align: right;">Page 343</p> <p>1 And you can see at the 2 bottom there the American Pain Society 3 logo, correct? 4 A. Yes. I was just looking to 5 see what the date was on there, but I 6 have not found that yet, just as a frame 7 of reference. 8 2002, okay, I see it. Thank 9 you. 10  11  12  13  14  15  16  17  18  19  20  21  22  23  24 </p>	<p style="text-align: right;">Page 345</p> <p>1 A. Their name is listed here, 2 yes. 3 Q. And do you see Janssen's 4 name? 5 A. Yes. 6 Q. So you weren't alone in 7 supporting these guidelines, correct, Ms. 8 Kitlinski? 9 MR. DAVIS: Objection to 10 form. 11 THE WITNESS: The whole 12 point of guideline projects is to 13 get the broadest support from 14 the -- not just pharmaceutical 15 industry, but groups like Hoechst 16 Foundation and the Faulding 17 Laboratories, so that the 18 guidelines are appropriately 19 funded. 20 BY MS. AMINOLROAYA: 21 Q. I'm going to add here to our 22 chart, Ms. Kitlinski, Purdue and Janssen 23 as supporters of the American Pain 24 Society.</p>

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<p>Page 346</p> <p>1 2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23 24</p> 	<p>Page 348</p> <p>1 2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23 24</p> 
<p>Page 347</p> <p>1 2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23 24</p> 	<p>Page 349</p> <p>1 2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23 24</p> 

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<p>Page 350</p> <div><div>1</div><div>2</div><div>3</div><div>4</div><div>5</div><div>6</div><div>7</div><div>8</div><div>9</div><div>10</div><div>11</div><div>12</div><div>13</div><div>14</div><div>15</div><div>16</div><div>17</div><div>18</div><div>19</div><div>20</div><div>21</div><div>22</div><div>23</div><div>24</div></div>	<p>Page 352</p> <div><div>1</div><div>2</div><div>3</div><div>4</div><div>5</div><div>6</div><div>7</div><div>8</div><div>9</div><div>10</div><div>11</div><div>12</div><div>13</div><div>14</div><div>15</div><div>16</div><div>17</div><div>18</div><div>19</div><div>20</div><div>21</div><div>22</div><div>23</div><div>24</div></div>
<p>Page 351</p> <div><div>1</div><div>2</div><div>3</div><div>4</div><div>5</div><div>6</div><div>7</div><div>8</div><div>9</div><div>10</div><div>11</div><div>12</div><div>13</div><div>14</div><div>15</div><div>16</div><div>17</div><div>18</div><div>19</div><div>20</div><div>21</div><div>22</div><div>23</div><div>24</div></div>	<p>Page 353</p> <div><div>1</div><div>2</div><div>3</div><div>4</div><div>5</div><div>6</div><div>7</div><div>8</div><div>9</div><div>10</div><div>11</div><div>12</div><div>13</div><div>14</div><div>15</div><div>16</div><div>17</div><div>18</div><div>19</div><div>20</div><div>21</div><div>22</div><div>23</div><div>24</div></div>

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<p>Page 355</p> <p>1 [REDACTED]</p> <p>2 [REDACTED]</p> <p>3 [REDACTED]</p> <p>4 [REDACTED]</p> <p>5 [REDACTED]</p> <p>6 [REDACTED]</p> <p>7 [REDACTED]</p> <p>8 [REDACTED]</p> <p>9 [REDACTED]</p> <p>10 [REDACTED]</p> <p>11 [REDACTED]</p> <p>12 [REDACTED]</p> <p>13 [REDACTED]</p> <p>14 [REDACTED]</p> <p>15 [REDACTED]</p> <p>16 [REDACTED]</p> <p>17 [REDACTED]</p> <p>18 [REDACTED]</p> <p>19 [REDACTED]</p> <p>20 [REDACTED]</p> <p>21 [REDACTED]</p> <p>22 [REDACTED]</p> <p>23 [REDACTED]</p> <p>24 [REDACTED]</p>	<p>Page 357</p> <p>1 [REDACTED]</p> <p>2 [REDACTED]</p> <p>3 [REDACTED]</p> <p>4 [REDACTED]</p> <p>5 [REDACTED]</p> <p>6 [REDACTED]</p> <p>7 [REDACTED]</p> <p>8 [REDACTED]</p> <p>9 [REDACTED]</p> <p>10 [REDACTED]</p> <p>11 [REDACTED]</p> <p>12 [REDACTED]</p> <p>13 [REDACTED]</p> <p>14 [REDACTED]</p> <p>15 [REDACTED]</p> <p>16 [REDACTED]</p> <p>17 [REDACTED]</p> <p>18 [REDACTED]</p> <p>19 [REDACTED]</p> <p>20 [REDACTED]</p> <p>21 [REDACTED]</p> <p>22 [REDACTED]</p> <p>23 [REDACTED]</p> <p>24 [REDACTED]</p>

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<p>Page 358</p> <p>1 [REDACTED]</p> <p>2 [REDACTED]</p> <p>3 [REDACTED]</p> <p>4 [REDACTED]</p> <p>5 [REDACTED]</p> <p>6 [REDACTED]</p> <p>7 [REDACTED]</p> <p>8 [REDACTED]</p> <p>9 [REDACTED]</p> <p>10 [REDACTED]</p> <p>11 [REDACTED]</p> <p>12 [REDACTED]</p> <p>13 [REDACTED]</p> <p>14 [REDACTED]</p> <p>15 [REDACTED]</p> <p>16 [REDACTED]</p> <p>17 MS. AMINOLROAYA: We'll add</p> <p>18 an exhibit number to this, this is</p> <p>19 Exhibit-44.</p> <p>20 - - -</p> <p>21 (Whereupon, Endo-Kitlinski</p> <p>22 Exhibit-44, No Bates,</p> <p>23 Demonstrative, was marked for</p> <p>24 identification.)</p>	<p>Page 360</p> <p>1 [REDACTED]</p> <p>2 [REDACTED]</p> <p>3 [REDACTED]</p> <p>4 take a break?</p> <p>5 VIDEO TECHNICIAN: Going off</p> <p>6 the record. The time is 5:13 p.m.</p> <p>7 - - -</p> <p>8 (Whereupon, a brief recess</p> <p>9 was taken.)</p> <p>10 - - -</p> <p>11 VIDEO TECHNICIAN: We're</p> <p>12 back on the record at 5:39 p.m.</p> <p>13 BY MS. AMINOLROAYA:</p> <p>14 Q. Ms. Kitlinski, turning your</p> <p>15 attention back to Exhibit-33.</p> <p>16 A. Thank you.</p> <p>17 [REDACTED]</p> <p>18 [REDACTED]</p> <p>19 [REDACTED]</p> <p>20 [REDACTED]</p> <p>21 [REDACTED]</p> <p>22 [REDACTED]</p> <p>23 [REDACTED]</p> <p>24 [REDACTED]</p>
<p>Page 359</p> <p>1 - - -</p> <p>2 (Whereupon, Endo-Kitlinski</p> <p>3 Exhibit-21, No Bates,</p> <p>4 Demonstrative, was marked for</p> <p>5 identification.)</p> <p>6 - - -</p> <p>7 BY MS. AMINOLROAYA:</p> <p>8 [REDACTED]</p> <p>9 [REDACTED]</p> <p>10 [REDACTED]</p> <p>11 [REDACTED]</p> <p>12 [REDACTED]</p> <p>13 [REDACTED]</p> <p>14 [REDACTED]</p> <p>15 [REDACTED]</p> <p>16 [REDACTED]</p> <p>17 [REDACTED]</p> <p>18 [REDACTED]</p> <p>19 [REDACTED]</p> <p>20 [REDACTED]</p> <p>21 [REDACTED]</p> <p>22 [REDACTED]</p> <p>23 [REDACTED]</p> <p>24 [REDACTED]</p>	<p>Page 361</p> <p>1 [REDACTED]</p> <p>2 [REDACTED]</p> <p>3 [REDACTED]</p> <p>4 [REDACTED]</p> <p>5 [REDACTED]</p> <p>6 [REDACTED]</p> <p>7 [REDACTED]</p> <p>8 [REDACTED]</p> <p>9 [REDACTED]</p> <p>10 [REDACTED]</p> <p>11 [REDACTED]</p> <p>12 [REDACTED]</p> <p>13 [REDACTED]</p> <p>14 [REDACTED]</p> <p>15 [REDACTED]</p> <p>16 [REDACTED]</p> <p>17 [REDACTED]</p> <p>18 [REDACTED]</p> <p>19 [REDACTED]</p> <p>20 [REDACTED]</p> <p>21 [REDACTED]</p> <p>22 [REDACTED]</p> <p>23 [REDACTED]</p> <p>24 [REDACTED]</p>

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<div>Page 363</div> <div><div>1</div><div>2</div><div>3</div><div>4</div><div>5</div><div>6</div><div>7</div><div>8</div><div>9</div><div>10</div><div>11</div><div>12</div><div>13</div><div>14</div><div>15</div><div>16</div><div>17</div><div>18</div><div>19</div><div>20</div><div>21</div><div>22</div><div>23</div><div>24</div></div> <div></div>	<div>Page 365</div> <div><div>1</div><div>2</div><div>3</div><div>4</div><div>5</div><div>6</div><div>7</div><div>8</div><div>9</div><div>10</div><div>11</div><div>12</div><div>13</div><div>14</div><div>15</div><div>16</div><div>17</div><div>18</div><div>19</div><div>20</div><div>21</div><div>22</div><div>23</div><div>24</div></div> <div></div>

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<p>Page 367</p> <p>1 2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23 24</p> 	<p>Page 369</p> <p>1 2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23 24</p> 




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<p>Page 371</p> <p>1 2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23 24</p> 	<p>Page 373</p> <p>1 2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23 24</p> 

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<p>Page 375</p> <p>1 2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23 24</p> 	<p>Page 377</p> <p>1 2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23 24</p> 

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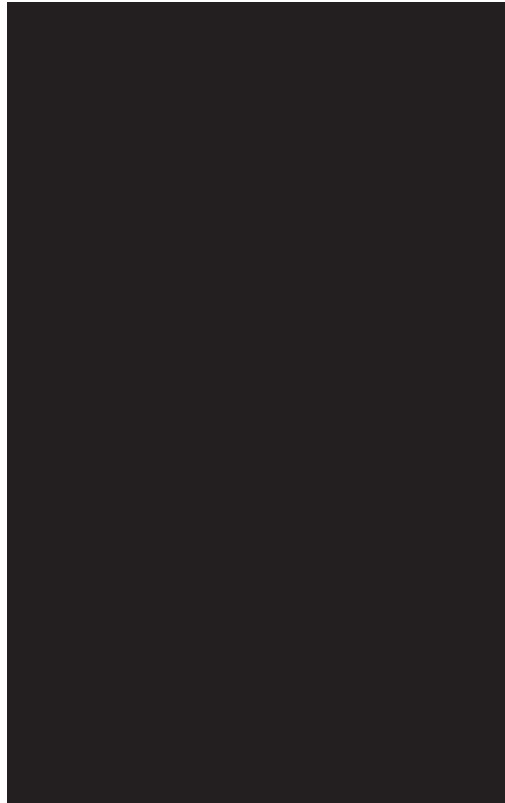
<p>Page 378</p> <p>1 [REDACTED]</p> <p>2 [REDACTED]</p> <p>3 [REDACTED]</p> <p>4 [REDACTED]</p> <p>5 [REDACTED]</p> <p>6 [REDACTED]</p> <p>7 [REDACTED]</p> <p>8 [REDACTED]</p> <p>9 [REDACTED]</p> <p>10 [REDACTED]</p> <p>11 [REDACTED]</p> <p>12 [REDACTED]</p> <p>13 [REDACTED]</p> <p>14 [REDACTED]</p> <p>15 [REDACTED]</p> <p>16 [REDACTED]</p> <p>17 [REDACTED]</p> <p>18 [REDACTED]</p> <p>19 [REDACTED]</p> <p>20 [REDACTED]</p> <p>21 [REDACTED]</p> <p>22 [REDACTED]</p> <p>23 [REDACTED]</p> <p>24 [REDACTED]</p>	<p>Page 380</p> <p>1 [REDACTED]</p> <p>2 [REDACTED]</p> <p>3 [REDACTED]</p> <p>4 [REDACTED]</p> <p>5 [REDACTED]</p> <p>6 [REDACTED]</p> <p>7 [REDACTED]</p> <p>8 [REDACTED]</p> <p>9 [REDACTED]</p> <p>10 [REDACTED]</p> <p>11 [REDACTED]</p> <p>12 [REDACTED]</p> <p>13 [REDACTED]</p> <p>14 [REDACTED]</p> <p>15 [REDACTED]</p> <p>16 [REDACTED]</p> <p>17 [REDACTED]</p> <p>18 [REDACTED]</p> <p>19 [REDACTED]</p> <p>20 [REDACTED]</p> <p>21 [REDACTED]</p> <p>22 [REDACTED]</p> <p>23 [REDACTED]</p> <p>24 [REDACTED]</p>
<p>Page 379</p> <p>1 [REDACTED]</p> <p>2 [REDACTED]</p> <p>3 [REDACTED]</p> <p>4 [REDACTED]</p> <p>5 [REDACTED]</p> <p>6 [REDACTED]</p> <p>7 [REDACTED]</p> <p>8 [REDACTED]</p> <p>9 [REDACTED]</p> <p>10 [REDACTED]</p> <p>11 [REDACTED]</p> <p>12 [REDACTED]</p> <p>13 [REDACTED]</p> <p>14 [REDACTED]</p> <p>15 [REDACTED]</p> <p>16 [REDACTED]</p> <p>17 [REDACTED]</p> <p>18 [REDACTED]</p> <p>19 [REDACTED]</p> <p>20 [REDACTED]</p> <p>21 [REDACTED]</p> <p>22 [REDACTED]</p> <p>23 [REDACTED]</p> <p>24 [REDACTED]</p>	<p>Page 381</p> <p>1 [REDACTED]</p> <p>2 [REDACTED]</p> <p>3 [REDACTED]</p> <p>4 [REDACTED]</p> <p>5 [REDACTED]</p> <p>6 [REDACTED]</p> <p>7 [REDACTED]</p> <p>8 [REDACTED]</p> <p>9 [REDACTED]</p> <p>10 [REDACTED]</p> <p>11 [REDACTED]</p> <p>12 [REDACTED]</p> <p>13 Q. Okay. Turn to Page -- it</p> <p>14 looks like we lost our E numbers on this</p> <p>15 page, because it's a darker document. It</p> <p>16 ends in 16042.</p> <p>17 MR. DAVIS: 042?</p> <p>18 MS. AMINOLROAYA: Yes.</p> <p>19 - - -</p> <p>20 (Whereupon, a discussion off</p> <p>21 the record occurred.)</p> <p>22 - - -</p> <p>23 BY MS. AMINOLROAYA:</p> <p>24 Q. And if we look at 16042, the</p>

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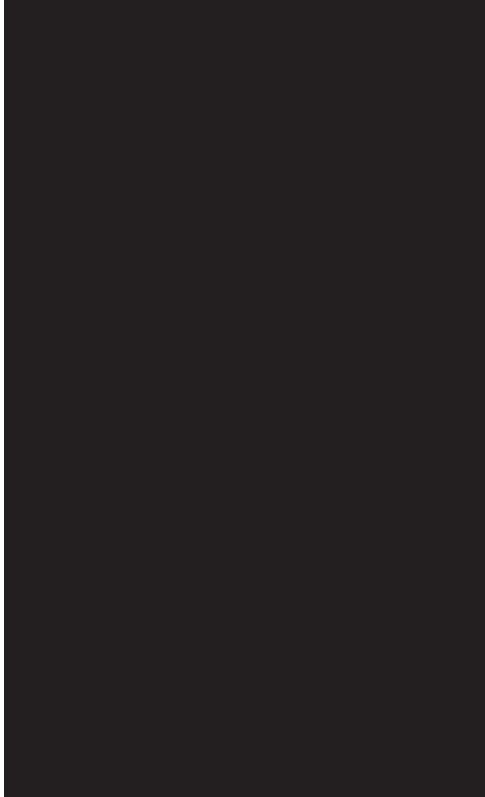


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<p>Page 419</p> <p>1 [REDACTED]</p> <p>2 [REDACTED]</p> <p>3 [REDACTED]</p> <p>4 [REDACTED]</p> <p>5 [REDACTED]</p> <p>6 [REDACTED]</p> <p>7 [REDACTED]</p> <p>8 [REDACTED]</p> <p>9 [REDACTED]</p> <p>10 [REDACTED]</p> <p>11 [REDACTED]</p> <p>12 [REDACTED]</p> <p>13 [REDACTED]</p> <p>14 [REDACTED]</p> <p>15 [REDACTED]</p> <p>16 [REDACTED]</p> <p>17 [REDACTED]</p> <p>18 [REDACTED]</p> <p>19 [REDACTED]</p> <p>20 [REDACTED]</p> <p>21 [REDACTED]</p> <p>22 [REDACTED]</p> <p>23 [REDACTED]</p> <p>24 [REDACTED]</p>	<p>Page 421</p> <p>1 Exhibit-47, Hard drive, was marked</p> <p>2 for identification.)</p> <p>3 - - -</p> <p>4 MR. BUCHANAN: Could you</p> <p>5 play it now, please?</p> <p>6 - - -</p> <p>7 (Whereupon, a video</p> <p>8 recording was played.)</p> <p>9 - - -</p> <p>10 BY MR. BUCHANAN:</p> <p>11 Q. I want to pause on that for</p> <p>12 a moment.</p> <p>13 [REDACTED]</p> <p>14 [REDACTED]</p> <p>15 [REDACTED]</p> <p>16 [REDACTED]</p> <p>17 [REDACTED]</p> <p>18 [REDACTED]</p> <p>19 [REDACTED]</p> <p>20 [REDACTED]</p> <p>21 [REDACTED]</p> <p>22 [REDACTED]</p> <p>23 [REDACTED]</p> <p>24 [REDACTED]</p>

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<p>Page 423</p> <p>1 2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23 24</p> 	<p>Page 425</p> <p>1 2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23 24</p> 

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<p>Page 435</p> <p>1 [REDACTED]</p> <p>2 [REDACTED]</p> <p>3 [REDACTED]</p> <p>4 [REDACTED]</p> <p>5 [REDACTED]</p> <p>6 [REDACTED]</p> <p>7 [REDACTED]</p> <p>8 [REDACTED]</p> <p>9 [REDACTED]</p> <p>10 [REDACTED]</p> <p>11 [REDACTED]</p> <p>12 [REDACTED]</p> <p>13 [REDACTED]</p> <p>14 [REDACTED]</p> <p>15 [REDACTED]</p> <p>16 [REDACTED]</p> <p>17 [REDACTED]</p> <p>18 MR. BUCHANAN: I appreciate</p> <p>19 your indulgence, counsel.</p> <p>20 VIDEO TECHNICIAN: Going off</p> <p>21 the record. The time is 6:35 p.m.</p> <p>22 - - -</p> <p>23 (Whereupon, a brief recess</p> <p>24 was taken.)</p>	<p>Page 437</p> <p>1 the MDL and as a result of</p> <p>2 production failures under the</p> <p>3 standing MDL order and lack of</p> <p>4 sufficient notice.</p> <p>5 And we also object because</p> <p>6 in Tennessee there are no time</p> <p>7 limits to depositions.</p> <p>8 So, with that objection,</p> <p>9 we'll proceed.</p> <p>10 MR. DAVIS: If I may, just</p> <p>11 because we dispute, obviously,</p> <p>12 there's been any production</p> <p>13 failures or notice failures.</p> <p>14 We also think that, sitting</p> <p>15 here in Pennsylvania deposing Ms.</p> <p>16 Kitlinski, it would be the</p> <p>17 Pennsylvania rules that would</p> <p>18 apply, nonetheless.</p> <p>19 But please go ahead.</p> <p>20 BY MR. LENISKI:</p> <p>21 Q. Ms. Kitlinski, before your</p> <p>22 deposition, we asked Endo's attorneys to</p> <p>23 [REDACTED]</p> <p>24 [REDACTED]</p>

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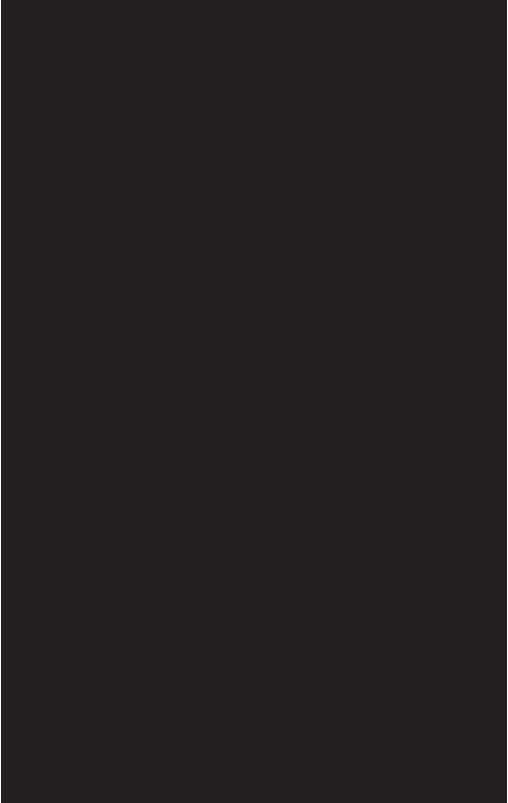
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<p>Page 487</p> <p>1 2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23 24</p> 	<p>Page 489</p> <p>1 2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23 24</p> 

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<p>Page 491</p> <p>1 2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23 24</p> 	<p>Page 493</p> <p>1 2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23 24</p> 

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<p style="text-align: right;">Page 494</p> <p>1 [REDACTED] 2 [REDACTED] 3 [REDACTED] 4 [REDACTED] 5 [REDACTED] 6 [REDACTED] 7 [REDACTED] 8 [REDACTED] 9 [REDACTED] 10 [REDACTED] 11 [REDACTED] 12 [REDACTED] 13 [REDACTED] 14 [REDACTED] 15 [REDACTED] 16 [REDACTED] 17 [REDACTED] 18 [REDACTED] 19 [REDACTED] 20 [REDACTED] 21 [REDACTED] 22 [REDACTED] 23 [REDACTED] 24 [REDACTED]</p>	<p style="text-align: right;">Page 496</p> <p>1 particular version is the September 2008 2 quarterly RiskMAP update report, which 3 covered the period from April 1st of 2008 4 to June 30th of 2008. 5 And this was produced within 6 Endo and provided to the FDA to apprise 7 them of our progress on these topics. 8 And if there are -- also to identify any 9 issues that might have arisen since the 10 last risk management -- RiskMAP report. 11 Q. Did this Exhibit-50 here, 12 the RiskMAP update report from September 13 3rd, 2008, relate only to the -- I guess, 14 what is that, the second quarter of 2008? 15 A. Yes. Period covering April 16 1st to June 30th. 17 Q. Did Endo ever submit any 18 other RiskMAP update reports to FDA? 19 A. Yes, on a quarterly basis. 20 Q. Did these RiskMAP update 21 reports generally follow the same format? 22 A. We had a template, which we 23 had worked out with -- you know, again, 24 with the first submission to the agency</p>
<p style="text-align: right;">Page 495</p> <p>1 Q. Ms. Kitlinski, I'd like to 2 show you what's been marked as 3 Exhibit-50, please. 4 A. Thank you. 5 - - - 6 (Whereupon, Endo-Kitlinski 7 Exhibit-50, 8 ENDO-OPIOID_MDL-01769386-592, was 9 marked for identification.) 10 - - - 11 MR. DAVIS: John, do you 12 have a copy to hand down? Oh, 13 yeah, we did this dance before, 14 didn't we? 15 BY MR. DAVIS: 16 Q. So, Ms. Kitlinski, the 17 document that's been marked Exhibit-50 18 bears the Bates number 19 ENDO-OPIOID_MDL-01769386. 20 Are you familiar with this 21 document, Ms. Kitlinski? 22 A. Yes. 23 Q. What is this document? 24 A. This is the -- this</p>	<p style="text-align: right;">Page 497</p> <p>1 so that it was uniform for them to follow 2 along, and also so that we were very 3 clear on who was -- you know, what fell 4 under what section, who was responsible 5 for that section and where new 6 information on that could appear. 7 Q. Did these RiskMAP update 8 reports contain information regarding the 9 continuing education that Endo supported 10 during the quarter covered by each 11 particular report? 12 A. Yes. 13 And, also, if new things 14 were initiated. So it might have been 15 that the activity was -- occurred then, 16 or it might be that, let's say, they were 17 developing new curriculum for one that 18 would occur in the future. 19 Q. Ms. Kitlinski, did FDA ever 20 provide any feedback to Endo in response 21 to its description of continuing 22 education in the quarterly RiskMAP update 23 reports? 24 MS. AMINOLROAYA: Objection</p>

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<p style="text-align: right;">Page 498</p> <p>1 to form. You're asking, sorry, if</p> <p>2 FDA provided feedback in the</p> <p>3 RiskMAPs that Endo submitted?</p> <p>4 MR. DAVIS: Let me ask it</p> <p>5 again.</p> <p>6 BY MR. DAVIS:</p> <p>7 Q. Ms. Kitlinski, did Endo ever</p> <p>8 provide any feedback -- did FDA -- I'll</p> <p>9 get it right.</p> <p>10 A. Three times is the charm.</p> <p>11 Q. Ms. Kitlinski, did FDA ever</p> <p>12 provide Endo with feedback regarding the</p> <p>13 information that Endo provided in its</p> <p>14 quarterly RiskMAP update reports</p> <p>15 regarding the continuing education -- the</p> <p>16 independent education that Endo</p> <p>17 supported?</p> <p>18 A. Not --</p> <p>19 MS. AMINOLROAYA: Objection.</p> <p>20 THE WITNESS: Not to my</p> <p>21 knowledge, with the exception of</p> <p>22 making the comment that it was,</p> <p>23 you know, a good, comprehensive</p> <p>24 program. And, in fact, I can't</p>	<p style="text-align: right;">Page 500</p> <p>1 Q. Did FDA ever tell Endo that</p> <p>2 the education it was supporting minimized</p> <p>3 the risks of abuse or misuse of opioids?</p> <p>4 MS. AMINOLROAYA: Same</p> <p>5 objection.</p> <p>6 THE WITNESS: No.</p> <p>7 BY MR. DAVIS:</p> <p>8 Q. Did FDA ever tell Endo that</p> <p>9 the education it supported minimized the</p> <p>10 risk of addiction associated with</p> <p>11 opioids?</p> <p>12 MS. AMINOLROAYA: Object to</p> <p>13 form.</p> <p>14 THE WITNESS: No.</p> <p>15 BY MR. DAVIS:</p> <p>16 Q. Did FDA ever tell Endo that</p> <p>17 the education it supported minimized the</p> <p>18 risk of overdose associated with opioids?</p> <p>19 A. No.</p> <p>20 MS. AMINOLROAYA: Objection.</p> <p>21 BY MR. DAVIS:</p> <p>22 Q. Does this -- does</p> <p>23 Exhibit-50, the RiskMAP report from</p> <p>24 September 3rd, 2008, Ms. Kitlinski,</p>
<p style="text-align: right;">Page 499</p> <p>1 recall if it was Doug</p> <p>2 Throckmartin, or someone who was</p> <p>3 associated with the development of</p> <p>4 the REMS, had referred to our</p> <p>5 educational -- our RiskMAP as one</p> <p>6 that was very thorough.</p> <p>7 And so I took that as a</p> <p>8 compliment.</p> <p>9 BY MR. DAVIS:</p> <p>10 Q. Did FDA ever say that the</p> <p>11 education that Endo was supporting was</p> <p>12 not balanced?</p> <p>13 A. No. Absolutely --</p> <p>14 MS. AMINOLROAYA: Objection</p> <p>15 to form.</p> <p>16 BY MR. DAVIS:</p> <p>17 Q. Did Endo ever -- or did FDA</p> <p>18 ever tell Endo that the education -- the</p> <p>19 independent education that it was</p> <p>20 supporting was biased in any way?</p> <p>21 MS. AMINOLROAYA: Objection</p> <p>22 to form.</p> <p>23 THE WITNESS: No.</p> <p>24 BY MR. DAVIS:</p>	<p style="text-align: right;">Page 501</p> <p>1 contain information regarding the</p> <p>2 education supported by Endo during that</p> <p>3 quarter?</p> <p>4 A. Yes, it does.</p> <p>5 Q. Can you describe for me</p> <p>6 generally the types of education Endo</p> <p>7 supported, the independent education Endo</p> <p>8 supported during the second quarter of</p> <p>9 2008, please?</p> <p>10 A. Yes. And if you look, I'll</p> <p>11 just -- rather than flipping through the</p> <p>12 report, I'll just work from the table of</p> <p>13 contents here.</p> <p>14 You can see that it's broken</p> <p>15 into several sections under education.</p> <p>16 Number one, the professional education</p> <p>17 initiatives. Again, those are the</p> <p>18 independent education initiatives that</p> <p>19 were supported through unrestricted</p> <p>20 educational grants.</p> <p>21 You'll see, then, there's</p> <p>22 patient and -- and under that section, we</p> <p>23 already discussed NIPC, so folks are</p> <p>24 familiar with that.</p>

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<p style="text-align: right;">Page 502</p> <p>1 We talked about the I-med --</p> <p>2 we didn't call it I-med, but it was the</p> <p>3 NIDA, National Institute on Drug Abuse,</p> <p>4 activity that was being coordinated by</p> <p>5 Penn State College of Medicine and NIDA.</p> <p>6 We talked about many of the</p> <p>7 collaborative efforts with the</p> <p>8 professional societies to have</p> <p>9 educational activities at their annual</p> <p>10 conferences.</p> <p>11 We talked about the</p> <p>12 residents/physician in training</p> <p>13 initiative.</p> <p>14 We spoke about painEDU,</p> <p>15 which was the Inflexxion website, and</p> <p>16 manual for clinicians.</p> <p>17 And then we spoke about the</p> <p>18 ACPE, accredited pharmacy education</p> <p>19 monographs.</p> <p>20 I think it's interesting you</p> <p>21 asked me about the evolution of things.</p> <p>22 In my capacity, one of my</p> <p>23 responsibilities at DuPont Merck was</p> <p>24 actually -- we were an accredited ACPE</p>	<p style="text-align: right;">Page 504</p> <p>1 activity. This was the Promise</p> <p>2 initiative, which was an Endo-developed</p> <p>3 activity for education.</p> <p>4 So that was the professional</p> <p>5 education.</p> <p>6 The patient and family</p> <p>7 education consisted of, we've talked</p> <p>8 about the Understanding Your Pain</p> <p>9 brochure. There was one on the -- that</p> <p>10 was not in this section, on pain rating,</p> <p>11 pain assessment inventory.</p> <p>12 So when you're going to your</p> <p>13 physician, how you can, you know, capture</p> <p>14 on the pain scale what your pain rating</p> <p>15 was, where the source of your pain was,</p> <p>16 descriptors for the pain.</p> <p>17 And then the Pain Action</p> <p>18 website, which had materials that could</p> <p>19 be downloaded, similar to those tear-pads</p> <p>20 that we were discussing for the state of</p> <p>21 Tennessee, you know, helping to educate</p> <p>22 families and caregivers on safe use and</p> <p>23 safe storage principles.</p> <p>24 And then beyond that, the</p>
<p style="text-align: right;">Page 503</p> <p>1 provider, so my activities there did</p> <p>2 involve directly working with the faculty</p> <p>3 and developing pharmacy education</p> <p>4 modules, maintaining the accreditation</p> <p>5 documents for that. And being, you know,</p> <p>6 in industry, you were ultra sure that you</p> <p>7 were not only adhering but, you know,</p> <p>8 exceeding those standards.</p> <p>9 So I had -- I know there was</p> <p>10 one area where someone was asking about a</p> <p>11 pharmacy monograph and the fact that we</p> <p>12 were, you know, being involved with that.</p> <p>13 And that was perfectly acceptable.</p> <p>14 We talked about the opioid</p> <p>15 handbooks; the principles of analgesic</p> <p>16 use; supporting the purchase of</p> <p>17 evidence-based guidelines.</p> <p>18 And then risk management</p> <p>19 information and tools for clinicians --</p> <p>20 I'll just refresh my memory on what</p> <p>21 specifically that was that we hadn't</p> <p>22 already talked about.</p> <p>23 Oh, this was -- this was</p> <p>24 actually not an independent educational</p>	<p style="text-align: right;">Page 505</p> <p>1 other area that we supported through</p> <p>2 educational grants was the development of</p> <p>3 psychometrically validated tools to help</p> <p>4 assess patients who were being considered</p> <p>5 for opioid therapy, that would be the</p> <p>6 SOAPP tool, or who were already on opioid</p> <p>7 therapy to manage them and to assure that</p> <p>8 their risks were mitigated; so that was</p> <p>9 SOAPP and CON.</p> <p>10 So those were the types of</p> <p>11 activities that were in our RiskMAP.</p> <p>12 Q. In addition to listing all</p> <p>13 of those educational activities in the</p> <p>14 table of contents, does this RiskMAP</p> <p>15 report from September of 2008 contain any</p> <p>16 further information about those</p> <p>17 educational activities?</p> <p>18 A. It has a summary for each of</p> <p>19 those. I mean, in the purposes of time,</p> <p>20 I just gave you my one-word CliffsNote</p> <p>21 version of it.</p> <p>22 But each of those areas</p> <p>23 would have a paragraph, two paragraphs or</p> <p>24 longer, describing what was relative for</p>

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<p style="text-align: right;">Page 506</p> <p>1 that quarter.</p> <p>2 Q. Did you review other</p> <p>3 quarterly RiskMAP update reports, other</p> <p>4 than this one from September 2008, Ms.</p> <p>5 Kitlinski?</p> <p>6 MS. AMINOLROAYA: Objection</p> <p>7 to the form.</p> <p>8 THE WITNESS: I --</p> <p>9 MS. AMINOLROAYA: Can we</p> <p>10 specify what time period the</p> <p>11 question relates to?</p> <p>12 MR. DAVIS: During the</p> <p>13 course of the RiskMAP.</p> <p>14 THE WITNESS: Yes. We would</p> <p>15 do this on a quarterly basis. So</p> <p>16 once a quarter I would prepare my</p> <p>17 sections, I would submit it to the</p> <p>18 regulatory team. They would</p> <p>19 incorporate the other sections</p> <p>20 from the other departments and</p> <p>21 produce the final version like</p> <p>22 we're looking at here.</p> <p>23 BY MR. DAVIS:</p> <p>24 Q. Did the other RiskMAP,</p>	<p style="text-align: right;">Page 508</p> <p>1 BY MR. DAVIS:</p> <p>2 Q. In response to any of the</p> <p>3 quarterly RiskMAP update reports, did FDA</p> <p>4 ever tell Endo to stop supporting any</p> <p>5 particular educational activity?</p> <p>6 A. No.</p> <p>7 MS. AMINOLROAYA: Objection</p> <p>8 to form.</p> <p>9 BY MR. DAVIS:</p> <p>10 Q. Ms. Kitlinski, does the --</p> <p>11 did the RiskMAP -- I know you talked to</p> <p>12 this a second ago -- you can set that</p> <p>13 aside if you'd like.</p> <p>14 Does the Opana ER -- did the</p> <p>15 Opana ER RiskMAP cover other areas beyond</p> <p>16 independent education?</p> <p>17 A. Yes.</p> <p>18 Q. Did you have responsibility</p> <p>19 for those areas?</p> <p>20 A. No, I did not.</p> <p>21 Q. Were there others at Endo</p> <p>22 that had responsibility for those areas?</p> <p>23 A. Yes. So the individuals in</p> <p>24 each department would produce their</p>
<p style="text-align: right;">Page 507</p> <p>1 quarterly RiskMAP reports that you</p> <p>2 reviewed, contain a similar number of</p> <p>3 educational activities?</p> <p>4 A. Yes. We are always</p> <p>5 committed to a very robust risk</p> <p>6 mitigation strategy. That's why we</p> <p>7 developed this in the first place.</p> <p>8 That's why we did it, even though it</p> <p>9 wasn't required.</p> <p>10 Q. Did FDA ever respond to any</p> <p>11 of the quarterly RiskMAP update</p> <p>12 reports -- let me ask a better question.</p> <p>13 In response to any of the</p> <p>14 RiskMAP update reports, did FDA ever ask</p> <p>15 Endo to support different educational</p> <p>16 activities?</p> <p>17 A. No. We did not --</p> <p>18 MS. AMINOLROAYA: Object to</p> <p>19 form.</p> <p>20 THE WITNESS: Until the REMS</p> <p>21 came out, in which case that</p> <p>22 applied to not just Endo, but the</p> <p>23 REMS, you know, applied to</p> <p>24 everyone.</p>	<p style="text-align: right;">Page 509</p> <p>1 section of the report, and it would be</p> <p>2 compiled by the regulatory department.</p> <p>3 Q. Do you know whether -- and,</p> <p>4 Ms. Kitlinski, you just referenced the</p> <p>5 REMS.</p> <p>6 A. Yes.</p> <p>7 Q. Did Endo -- did the REMS --</p> <p>8 were you referring to the</p> <p>9 extended-release long-acting opioid REMS?</p> <p>10 A. Yes, that's correct.</p> <p>11 Q. And does -- I'll just refer</p> <p>12 to that as the REMS for now.</p> <p>13 A. Yes.</p> <p>14 Q. Did the REMS contain an</p> <p>15 educational component?</p> <p>16 A. Yes, it did. They call it</p> <p>17 training in the REMS language, but we</p> <p>18 worked through that with them so they</p> <p>19 understood it was education and we</p> <p>20 understood it was training, and we used</p> <p>21 the words, you know, education/training.</p> <p>22 Q. Did Endo continue to support</p> <p>23 independent education following the</p> <p>24 implementation of the REMS?</p>

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<p>1 MS. AMINOLROAYA: Objection</p> <p>2 to form.</p> <p>3 THE WITNESS: We did for a</p> <p>4 period of time. And then there</p> <p>5 were concerns that by -- so I'll</p> <p>6 step back for a second.</p> <p>7 The REMS, besides requiring</p> <p>8 education, established goals of</p> <p>9 how many -- they called them</p> <p>10 completers, how many clinicians</p> <p>11 needed to have completed training,</p> <p>12 their word, on the full blueprint</p> <p>13 in order to count towards the REMS</p> <p>14 goals.</p> <p>15 So the FDA had very strict</p> <p>16 goals of what was required within,</p> <p>17 you know, the first year of the</p> <p>18 REMS being available and the</p> <p>19 second year, et cetera.</p> <p>20 And because of the length of</p> <p>21 the -- the length of the</p> <p>22 blueprint, which, therefore,</p> <p>23 dictated the length of the CE</p> <p>24 activities, many of them were</p>	<p>1 confusion that if you were a</p> <p>2 practicing clinician and you</p> <p>3 participated in this activity that</p> <p>4 was three hours long and talked</p> <p>5 about the safer use of opioids,</p> <p>6 you would have considered that you</p> <p>7 can -- completed, you know,</p> <p>8 appropriate education on opioids.</p> <p>9 You would not be likely to then</p> <p>10 sit through another three hours of</p> <p>11 REMS-compliant training.</p> <p>12 And so that was one of the</p> <p>13 big things we learned up front was</p> <p>14 clinicians don't know or care what</p> <p>15 REMS means; if you talk about safe</p> <p>16 use of opioids, they'll be</p> <p>17 interested in that. If you say</p> <p>18 you should go to this because it's</p> <p>19 an FDA REMS-mandated activity,</p> <p>20 they probably care less.</p> <p>21 So we tried to not dilute</p> <p>22 the pool of physicians and</p> <p>23 clinicians who were willing to,</p> <p>24 you know, participate in the REMS</p>
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<p>1 three hours long, two and-a-half</p> <p>2 hours, three hours, even a little</p> <p>3 bit longer than that. There</p> <p>4 was -- you know, clinicians are</p> <p>5 busy and, again, were not</p> <p>6 necessarily standing in line to</p> <p>7 give up three or four hours of</p> <p>8 their time to participate in an</p> <p>9 educational activity, albeit CE</p> <p>10 accredited, and albeit one of key</p> <p>11 importance.</p> <p>12 So what we realized after</p> <p>13 the first year was that we were</p> <p>14 potentially -- because there was a</p> <p>15 lot of -- if there was other</p> <p>16 opioid education, so, for example,</p> <p>17 NIDA, I remember having a</p> <p>18 discussion with NIDA, who had done</p> <p>19 a Medscape activity talking about</p> <p>20 the responsible use of opioid</p> <p>21 analgesics, and it was three hours</p> <p>22 long, again, which was similar to</p> <p>23 the REMS.</p> <p>24 So there was a lot of</p>	<p>1 education, because that was</p> <p>2 mandatory for us because we had</p> <p>3 goals that we had to meet.</p> <p>4 And so while we were trying</p> <p>5 to do the right thing by offering</p> <p>6 greater diversity of education, it</p> <p>7 became apparent that that was</p> <p>8 having a potential negative effect</p> <p>9 on people participating on the</p> <p>10 REMS.</p> <p>11 BY MR. DAVIS:</p> <p>12 Q. At that point, did Endo</p> <p>13 continue to support independent education</p> <p>14 through its participation in REMS?</p> <p>15 A. Yes, we did.</p> <p>16 Q. Did FDA -- were you aware of</p> <p>17 whether the REMS consortium shared any</p> <p>18 information with FDA?</p> <p>19 A. With regards to the progress</p> <p>20 on the REMS, is that what you're</p> <p>21 referring to?</p> <p>22 Q. I'm specifically talking</p> <p>23 about the content of the education</p> <p>24 supported by the REMS consortium.</p>

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<p style="text-align: right;">Page 514</p> <p>1 MS. AMINOLROAYA: Objection 2 to form. 3 THE WITNESS: So the RPC, 4 the REMS program companies, 5 provided a -- again, a report, a 6 periodic report to the FDA, the 7 first ones were shorter periods of 8 time, the others were, you know, 9 24, 36 months, et cetera, advising 10 them of the progress, in terms of 11 the metrics, the REMS metrics, 12 where we stood with regard to the 13 goals they had determined, where 14 we stood with regards to the 15 evaluations, you know, we were 16 talking about the fact that 17 education -- accredited education 18 needs to have a metric for 19 determining whether you've 20 accomplished -- whether the CE 21 provider has accomplished the 22 goals they set out to do. 23 So all of that information 24 was communicated periodically in a</p>	<p style="text-align: right;">Page 516</p> <p>1 requirement to have a realtime website 2 that would list -- and it was searchable, 3 if you were a primary care physician in 4 Pennsylvania and you were looking to 5 participate in a REMS education activity, 6 you would be able to do a keyword search 7 and find either live or online activities 8 that were, you know, aligned with your 9 interests. 10 So the FDA received regular 11 updates on that as well. 12 Q. Ms. Kitlinski, did Endo 13 exercise any control over the content of 14 the independent education it supported 15 through the RiskMAP? 16 MS. AMINOLROAYA: Objection 17 to form. 18 THE WITNESS: Through the -- 19 through the RiskMAP? 20 BY MR. DAVIS: 21 Q. Yes. 22 A. Again, Endo did not 23 contribute -- control, exert influence or 24 control the content because, ultimately,</p>
<p style="text-align: right;">Page 515</p> <p>1 very lengthy report to the FDA. 2 BY MR. DAVIS: 3 Q. Did the FDA ever provide 4 direction to the REMS program companies 5 about the types of independent education 6 those companies should be supporting 7 through their participation in REMS? 8 A. No. They were part of the 9 discussions of what the intent was. And 10 it was emphasized that it was to reach a 11 broad audience of especially primary care 12 providers. 13 They knew how, in fact, we 14 had sent the request for proposal, the 15 draft, to them in advance of putting it 16 out there to the CE community to make 17 sure that they knew what we were asking 18 for and to make sure that it was aligned 19 with their expectations. 20 And they received reports 21 from the REMS companies, for example, 22 after each grant cycle saying, these are 23 the grants that have been -- have been 24 approved. Part of the REMS was the</p>	<p style="text-align: right;">Page 517</p> <p>1 that resided with the CE provider and 2 with the faculty and the program 3 development team. 4 I do say, as I said before, 5 in the early days, when appropriate and 6 compliant with the guidelines, when 7 asked, we did provide input on broad 8 topics, potential faculty who were -- who 9 were therapeutic experts or a courtesy 10 medical review for looking for medical 11 accuracy regarding our information. 12 Q. In those early days, would 13 Endo provide specific content related to 14 the broad topics it had offered? 15 A. No. 16 Q. Did Endo exert any control 17 over the content of the independent 18 education supported through REMS? 19 MS. AMINOLROAYA: Objection 20 to form. 21 THE WITNESS: No. And 22 the -- again, I'll preface this, 23 since this whole REMS was a little 24 bit of a different -- sort of a</p>

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<p>1 different animal, part of the REMS 2 blueprint, which FDA did require 3 each company to submit, was -- 4 Section 6 of the REMS blueprint 5 was product-specific information 6 on each of the ERLA opioid REMS 7 products. 8 So, for example, for Endo, 9 Opana ER, we were required to 10 submit a one-page summary of 11 contraindications, warning, 12 dosage, any particular risk issues 13 that were in the labeling so that 14 if a clinician was going to 15 prescribe any one of the ERLA 16 opioids, they could look at 17 Section 6 and they could know what 18 the sort of relevant issues were 19 for that particular drug, as 20 opposed to for the class. 21 And so that we were asked to 22 provide -- our regulatory and our 23 R&D teams provided that to the 24 FDA. The FDA, again, made sure</p>	<p>1 you went through during the course of 2 plaintiffs' examination. 3 Can we start with 4 Exhibit-35, please? And this is, again, 5 just for the record, Bates labeled 6 ENDO-OPIOID_MDL-06234029. 7 Do you recall discussion of 8 this document, Ms. Kitlinski? 9 A. Yes. 10 Q. And what is this document? 11 A. This was a -- an update from 12 the American Pain Foundation to Endo 13 about its -- when John Giglio took over 14 the responsibilities there, the overview 15 of the American Pain Foundation, what 16 some of their recent accomplishments 17 were, where they were heading in the 18 future. 19 Q. Do you recall questions 20 about Endo's support for the recent APF 21 accomplishments described in this 22 document? 23 A. I do, yes. 24 Q. And do you see that sentence</p>
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<p>1 that it was appropriately vetted 2 through their own internal 3 organization and consistent with 4 the labeling, and also that it was 5 vetted through the DHHS, HHS, 6 NIDA, SAMSA folks who were also 7 reviewing everything. 8 So, again, that was the work 9 product of the FDA, which was what 10 the blueprint was, but we did have 11 that -- that responsibility to 12 present that one-page synopsis on 13 our particular products. 14 BY MR. DAVIS: 15 Q. Separate and apart from that 16 one-page synopsis, did Endo exert any 17 control over the independent education 18 supported through REMS? 19 A. No. 20 MS. AMINOLROAYA: Objection 21 to form. 22 BY MR. DAVIS: 23 Q. Ms. Kitlinski, I'd like to 24 ask you about a few of the documents that</p>	<p>1 on the second page of this document? 2 A. With support -- Page 2 here, 3 With support from Endo? 4 Q. Yes. 5 A. Yes. 6 Q. Was Endo the only funder of 7 APF's recent accomplishments? 8 A. No. As I pointed out when 9 we were going through the brochure itself 10 as well, there were many other funders, 11 both industry and nonindustry supporters. 12 Q. Do you recall plaintiffs' 13 counsel asking you about the patient 14 education materials described on Page 3 15 of the document? 16 A. Yes. 17 Q. Were those patient education 18 materials the only recent APF 19 accomplishments described in this letter? 20 A. No. As you can see, there 21 were at least a page of accomplishments, 22 talking about education, as well as their 23 work in the field of pain management and 24 advocacy.</p>

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<p style="text-align: right;">Page 522</p> <p>1 Q. You just said "pain 2 management" there, Ms. Kitlinski. 3 Does that mean opioids? 4 A. Opioids are one element of 5 pain management. But what American Pain 6 Foundation, and all of the other national 7 pain organizations, are committed to, 8 unless it was a specific one like the 9 Varicella Zoster Foundation, which was 10 only associated with that particular area 11 of pain, but for the majority, the 12 American Chronic Pain Association, the 13 National Pain Foundation, the ACPA, all 14 of the professional organizations, their 15 goal was much broader. It was for 16 correct and appropriate assessment of 17 patients, assuring that patients were 18 able to describe their needs to their 19 clinicians, assuring that clinicians had 20 access to a broad spectrum of analgesic 21 modalities, whether they be 22 pharmacologic, nonpharmacologic, you 23 know, combination, multimodal therapies, 24 all of those.</p>	<p style="text-align: right;">Page 524</p> <p>1 exit strategy so that the patient 2 understood this was a trial. 3 Q. Let's look at one of the 4 patient education materials referred to 5 in this APF document. It's Exhibit-36. 6 And that bears the Bates number 7 CHI000435580. 8 Do you recall discussing 9 this document with plaintiffs' counsel, 10 Ms. Kitlinski? 11 A. Yes. 12 Q. And what is this document? 13 A. Again, this is a, 14 quote/unquote, pain action guide, a 15 brochure that was developed by the 16 American Pain Foundation talking about 17 the -- again, pain in general, as we've 18 been discussing all day, that there are 19 two concomitant public health situations. 20 One is chronic pain and the other is the 21 public health situation associated with 22 abuse and misuse of opioid analgesics. 23 This was to give information 24 to patients that they could discuss with</p>
<p style="text-align: right;">Page 523</p> <p>1 So that's what pain 2 management is when I use that term. And 3 certainly opioids is one element of that. 4 Q. But just one element, right? 5 A. Yes. And certainly not the 6 first element. All of the -- I know that 7 there were some sentences or bullet 8 points that pointed out today about 9 opioids and, perhaps, someone might have 10 mistakenly believed that that was the 11 first alternative that was recommended in 12 all of these educational materials, 13 whether they were independent or 14 otherwise. 15 And, indeed, without 16 exception, they all indicated that opioid 17 should be used when other modalities have 18 failed to provide sufficient pain relief 19 or when there are untoward issues which 20 necessitated adding an opioid or 21 considering adding an opioid. 22 And, again, in all 23 instances, the education emphasized the 24 need, right from the get-go, of having an</p>	<p style="text-align: right;">Page 525</p> <p>1 their families and their caregivers. 2 Sort of simple lay language like, what 3 can I do? Talk to your doctor and nurse 4 about pain. It's a common medical 5 problem that requires attention, so you 6 shouldn't be ashamed to talk about it. 7 Tell your doctor or nurse where it hurts 8 so they can help localize it. Describe 9 how much your pain hurts. So it was 10 practical, lay language that could be 11 utilized. 12 And resources. Keep a pain 13 diary. You know, use a pain rating 14 scale. That type of thing. 15 Q. Do you recall plaintiffs 16 asking you questions about this document? 17 A. I recall us -- I recall us 18 talking about the document. And I know 19 that we asked at least one question on 20 it. 21 Q. How many pages is this 22 document? 23 A. It looks like 14. 24 Q. How many pages did</p>

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<p style="text-align: right;">Page 526</p> <p>1 plaintiffs ask you about?</p> <p>2 A. I believe it was one point</p> <p>3 on one page.</p> <p>4 Q. Okay. They did not ask you</p> <p>5 about the whole document, did they?</p> <p>6 A. No.</p> <p>7 Q. They did not ask you about</p> <p>8 anything other than this one point on</p> <p>9 Page 6, correct?</p> <p>10 A. Yes, that's correct.</p> <p>11 Q. Okay. They didn't ask you</p> <p>12 about, for example, on Page 10,</p> <p>13 suggestions to ask your doctor or nurse</p> <p>14 about nondrug, nonsurgical treatments,</p> <p>15 did they?</p> <p>16 A. No.</p> <p>17 Q. Did they ask you questions</p> <p>18 about the suggestion that a patient ask</p> <p>19 their doctor or nurse about ways to relax</p> <p>20 and cope with pain?</p> <p>21 A. No.</p> <p>22 Q. Okay. You can set that one</p> <p>23 aside.</p> <p>24 Let's look at Exhibit-40,</p>	<p style="text-align: right;">Page 528</p> <p>1 asking you about any slide other than the</p> <p>2 top slide on the page that bears the</p> <p>3 Bates number ending 8066?</p> <p>4 A. No, I do not. It was -- the</p> <p>5 pseudoaddiction was the only point that</p> <p>6 they raised out of this.</p> <p>7 Q. Did they -- did plaintiffs</p> <p>8 ask you about, if you flip to the</p> <p>9 beginning, about the agenda for the</p> <p>10 fundamentals of pain management program?</p> <p>11 A. No.</p> <p>12 Q. Do all of the sessions</p> <p>13 described over the several days of this</p> <p>14 program relate to opioids?</p> <p>15 A. Not by a long shot, no.</p> <p>16 There is one session on pain</p> <p>17 pharmacology -- well, first of all, to</p> <p>18 take a step back. It's not even that</p> <p>19 there are -- the whole sessions relate to</p> <p>20 pharmacologic therapy. It talks about</p> <p>21 assessment and physical exam and taking a</p> <p>22 history.</p> <p>23 And then there is one</p> <p>24 session on pain pharmacology presented by</p>
<p style="text-align: right;">Page 527</p> <p>1 please. And this exhibit bears the Bates</p> <p>2 number ENDO-OPIOID_MDL-05968029.</p> <p>3 Ms. Kitlinski, do you recall</p> <p>4 this document?</p> <p>5 A. Yes. This was part of the</p> <p>6 syllabus from the American Pain Society</p> <p>7 residents course.</p> <p>8 Q. Let's flip to the primer and</p> <p>9 the syllabus.</p> <p>10 Just ballpark, how many</p> <p>11 pages is this syllabus?</p> <p>12 A. It looked about 50 pages,</p> <p>13 printouts.</p> <p>14 Q. And many of the pages</p> <p>15 contain -- do many of the pages contain</p> <p>16 more than one slide?</p> <p>17 A. There are generally three</p> <p>18 slides, three up on each page; so 150</p> <p>19 slides, approximately.</p> <p>20 Q. Do you recall how many of</p> <p>21 these slides plaintiffs asked you about?</p> <p>22 A. I do not, but I believe it</p> <p>23 was a limited number.</p> <p>24 Q. Do you recall plaintiffs</p>	<p style="text-align: right;">Page 529</p> <p>1 Dr. Barry Kohl, after the pain</p> <p>2 pharmacology of nonopioid analgesics is</p> <p>3 presented by Dr. Argoff.</p> <p>4 There is also, on the second</p> <p>5 day, the assessment and management of</p> <p>6 aberrant behaviors associated with</p> <p>7 analgesic use.</p> <p>8 So those are the only --</p> <p>9 unless I'm missing, my guess here, the</p> <p>10 only opioid-related courses. And</p> <p>11 methadone, I'm sorry, the devil is in the</p> <p>12 details, sort of discussing the dosing</p> <p>13 challenges and the very variable and</p> <p>14 extended half-life of that drug.</p> <p>15 Q. Did plaintiffs ask you about</p> <p>16 any of the nonopioid-related sessions for</p> <p>17 the fundamentals of pain management</p> <p>18 section?</p> <p>19 A. No.</p> <p>20 Q. Did they ask you about any</p> <p>21 of the other many slides contained in</p> <p>22 this document, other than the one that we</p> <p>23 just referenced?</p> <p>24 A. No.</p>

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<p>1 Q. You can set that one aside,</p> <p>2 Ms. Kitlinski.</p> <p>3 I'd like you to look at</p> <p>4 Exhibit-42, please, if you would. This</p> <p>5 document bears a number of Bates numbers,</p> <p>6 but I'll go with the one at the bottom,</p> <p>7 which is, I think, the one cited in the</p> <p>8 record thus far, which is PYK181215547.</p> <p>9 Do you recall this document,</p> <p>10 Ms. Kitlinski?</p> <p>11 A. Yes.</p> <p>12 Q. What is this document?</p> <p>13 A. This is the guideline for</p> <p>14 osteoarthritis, rheumatoid arthritis and</p> <p>15 juvenile chronic arthritis that was</p> <p>16 developed by the American Pain Society in</p> <p>17 2002.</p> <p>18 Q. And did plaintiffs ask you</p> <p>19 about any of the content of this</p> <p>20 document?</p> <p>21 A. I don't believe so. We read</p> <p>22 it up -- and we were talking about it --</p> <p>23 about guidelines, but I don't believe</p> <p>24 that we actually delved into any of the</p>	<p>1 Tramadol is an atypical agent, but could</p> <p>2 be characterized as an opioid as well.</p> <p>3 So there might be four pages there.</p> <p>4 Q. And how many pages is this</p> <p>5 guideline?</p> <p>6 A. It looks to be about 131,</p> <p>7 plus the appendices and index.</p> <p>8 Q. And was this an APS</p> <p>9 guideline?</p> <p>10 A. Yes.</p> <p>11 Q. When I say "APS," do you</p> <p>12 understand me to mean the American Pain</p> <p>13 Society?</p> <p>14 A. The American Pain Society,</p> <p>15 yes.</p> <p>16 Q. And do you have an</p> <p>17 understanding of the American Pain</p> <p>18 Society's objectives?</p> <p>19 MS. AMINOLROAYA: Objection</p> <p>20 to form.</p> <p>21 THE WITNESS: Well, I</p> <p>22 believe they -- they lay it out</p> <p>23 here in the preface, which is</p> <p>24 intending -- they convened an</p>
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<p>1 content here.</p> <p>2 Q. And does -- do these</p> <p>3 guidelines address topics other than</p> <p>4 opioids?</p> <p>5 A. Yes, very much so. Again,</p> <p>6 pain assessment and the overview of the</p> <p>7 pathophysiology associated with these</p> <p>8 various disease -- arthritic types of</p> <p>9 diseases.</p> <p>10 Certainly, the, you know,</p> <p>11 first line therapy for OA is -- are not</p> <p>12 opioids; Tylenol, NSAIDs, et cetera. So</p> <p>13 this goes through the -- goes through the</p> <p>14 analgesics component here, starting on</p> <p>15 Page 54, talking about analgesics,</p> <p>16 acetaminophen, nonsteroidals, topical</p> <p>17 agents, hyaluronic acid, et cetera,</p> <p>18 DMARDs.</p> <p>19 And then there is, it looks</p> <p>20 like, three pages on opioids, the first</p> <p>21 of which is addiction, physical</p> <p>22 dependence and tolerance. One page on</p> <p>23 the effectiveness and use of opioids.</p> <p>24 And then one page on opioid dosing.</p>	<p>1 arthritis pain management panel</p> <p>2 over the course of two years, with</p> <p>3 all of the top therapeutic experts</p> <p>4 in rheumatology, and they worked</p> <p>5 with -- and orthopedic surgeons as</p> <p>6 well, and developed this</p> <p>7 interdisciplinary panel of experts</p> <p>8 who were -- then provided the</p> <p>9 recommendations for this</p> <p>10 guideline.</p> <p>11 So that it incorporated all</p> <p>12 of the -- not just pain</p> <p>13 specialists, but all the</p> <p>14 specialists who manage arthritic</p> <p>15 pain.</p> <p>16 BY MR. DAVIS:</p> <p>17 Q. You can set that aside, Ms.</p> <p>18 Kitlinski.</p> <p>19 Will you look at Exhibit-43,</p> <p>20 please? And this bears the Bates number</p> <p>21 END00051370.</p> <p>22 Do you recall this document,</p> <p>23 Ms. Kitlinski?</p> <p>24 A. Yes, I do.</p>

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<p style="text-align: right;">Page 534</p> <p>1 Q. What is this document?</p> <p>2 A. This is the handbook</p> <p>3 entitled, Responsible Opioid Prescribing,</p> <p>4 a Physician's Guide, that was authored by</p> <p>5 Scott Fishman, Dr. Scott Fishman, and</p> <p>6 distributed -- made available through the</p> <p>7 Federation of State Medical Boards.</p> <p>8 Q. How many pages is this</p> <p>9 document, Ms. Kitlinski?</p> <p>10 A. It looks to be about 125</p> <p>11 pages.</p> <p>12 Q. Do you recall plaintiffs</p> <p>13 asking you questions about this document?</p> <p>14 A. We did look at one point in</p> <p>15 here.</p> <p>16 Q. Do you recall how many pages</p> <p>17 they asked you questions about?</p> <p>18 A. I know it was at least one.</p> <p>19 I'm sorry, I don't.</p> <p>20 Q. Okay. Let's look at Page</p> <p>21 28, please, of the actual book copy, not</p> <p>22 the number up top, sorry.</p> <p>23 A. That's all right.</p> <p>24 Q. Do you recall -- do you see</p>	<p style="text-align: right;">Page 536</p> <p>1 Q. And what are those public --</p> <p>2 important public health trends described</p> <p>3 by this book?</p> <p>4 A. Well, this is a really, I</p> <p>5 think, appropriate way of depicting here</p> <p>6 the twin serpents in the caduceus,</p> <p>7 right? So you've got the public health</p> <p>8 trend of the shifting patterns of drug</p> <p>9 abuse from illicit to prescription drugs,</p> <p>10 a notable rise in diversion and</p> <p>11 nonmedical use of opioid pain</p> <p>12 medications, and then on the flip side of</p> <p>13 it, the attention that pain in general,</p> <p>14 chronic pain, is often undertreated or</p> <p>15 undiagnosed.</p> <p>16 And so it's, as the author</p> <p>17 puts it, the perfect storm, if you will,</p> <p>18 of clinicians needing to manage those</p> <p>19 dual public health crises in a reasonable</p> <p>20 way.</p> <p>21 Q. Does this language recognize</p> <p>22 the risk associated with opioid</p> <p>23 analgesics?</p> <p>24 MS. AMINOLROAYA: Objection</p>
<p style="text-align: right;">Page 535</p> <p>1 the --</p> <p>2 A. Oh, yes.</p> <p>3 Q. -- do you recall plaintiffs</p> <p>4 asking you about any other section of</p> <p>5 this book besides that one paragraph on</p> <p>6 Page 28?</p> <p>7 A. No. It was about patient --</p> <p>8 about clinicians being sued for not</p> <p>9 treating pain aggressively.</p> <p>10 Q. Will you look at Page 5 of</p> <p>11 the book, please, Ms. Kitlinski?</p> <p>12 A. Page 1 of the actual book,</p> <p>13 Page 5 of --</p> <p>14 Q. I'm sorry, I'm going by the</p> <p>15 book numbers. So it's the page that</p> <p>16 reads, Introduction, pharmacovigilance</p> <p>17 and good medicine.</p> <p>18 A. Got it. Yes.</p> <p>19 Q. Are you familiar with the</p> <p>20 language on this page?</p> <p>21 A. Yes.</p> <p>22 Q. Does this language speak to</p> <p>23 important public health trends?</p> <p>24 A. Yes, it does.</p>	<p style="text-align: right;">Page 537</p> <p>1 to form.</p> <p>2 THE WITNESS: Absolutely.</p> <p>3 BY MR. DAVIS:</p> <p>4 Q. And what does it say about</p> <p>5 the risk of opioid analgesics?</p> <p>6 A. Again, it goes into the fact</p> <p>7 that, you know, clinicians need to be</p> <p>8 sensitive to and knowledgeable about</p> <p>9 pharmacovigilance and risk management.</p> <p>10 It says the combination of</p> <p>11 the potential of therapeutic benefit but</p> <p>12 the high risk associated with opioid</p> <p>13 analgesics leaves them no alternative but</p> <p>14 to become more sophisticated risk</p> <p>15 managers in their patients.</p> <p>16 Q. Did plaintiffs --</p> <p>17 A. And so -- and it states</p> <p>18 explicitly that, we cannot ignore the</p> <p>19 potential risks associated with the use</p> <p>20 of controlled substance, including</p> <p>21 addiction, and that managing risk is</p> <p>22 something that clinicians do in their</p> <p>23 everyday clinical practice.</p> <p>24 Q. Did plaintiffs ask you any</p>

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<p style="text-align: right;">Page 538</p> <p>1 questions about that language?</p> <p>2 A. No.</p> <p>3 Q. Ms. Kitlinski, we're close.</p> <p>4 We're close. I know you've been sitting</p> <p>5 here for a long time.</p> <p>6 A. And I -- may I just make one</p> <p>7 additional comment?</p> <p>8 Q. Please. Please.</p> <p>9 A. One of the -- I think the</p> <p>10 greatest impact of this particular tool</p> <p>11 was in the foreward, which was authored</p> <p>12 by James Thompson, who was the president</p> <p>13 of the Federation of State Medical</p> <p>14 Boards, and his comment here that says,</p> <p>15 you know, Patients in pain who rely on</p> <p>16 opioids for analgesia deserve access to</p> <p>17 safe and effective medication; to deprive</p> <p>18 them of this pain relief certainly does</p> <p>19 them harm. Yet, these same</p> <p>20 life-restoring medications carry the</p> <p>21 potential to do grave harm to patients</p> <p>22 who may be at risk for addiction and</p> <p>23 abuse. Significant quantities of</p> <p>24 prescription opioids are diverted into</p>	<p style="text-align: right;">Page 540</p> <p>1 A. Yes.</p> <p>2 Q. Ms. Kitlinski, we saw a few</p> <p>3 documents earlier today that contained</p> <p>4 the phrase -- it might have just been two</p> <p>5 documents, contained the phrase "ROI."</p> <p>6 Do you recall those?</p> <p>7 A. Yes.</p> <p>8 Q. Do you have an understanding</p> <p>9 as to what ROI is generally?</p> <p>10 A. Well, I understand what ROI</p> <p>11 generally is in the noneducation field.</p> <p>12 It's the ability to determine what the</p> <p>13 return on investment is for a given</p> <p>14 initiative.</p> <p>15 Q. Did Endo ever conduct any</p> <p>16 return on investment with respect to any</p> <p>17 of its opioid -- any of the</p> <p>18 opioid-related independent education it</p> <p>19 supported?</p> <p>20 A. No. It would be</p> <p>21 inappropriate to do so.</p> <p>22 And, you know, return on --</p> <p>23 ROI is not the same as discussing a</p> <p>24 return on education, in terms of, you</p>
<p style="text-align: right;">Page 539</p> <p>1 the illegal black market that puts</p> <p>2 millions of nonmedical, quote,</p> <p>3 recreational users at risk of addiction</p> <p>4 and death, many of them young adults and</p> <p>5 teenagers. While very few</p> <p>6 clinicians/physicians are complicit in</p> <p>7 this criminal diversion and there are no</p> <p>8 proven methods from preventing patients</p> <p>9 from deceptively acquiring prescriptions,</p> <p>10 but the fact that some patients will</p> <p>11 deceive a physician in order to obtain</p> <p>12 prescription opioids for nonmedical use</p> <p>13 requires us to be vigilant when</p> <p>14 prescribing these potent and potentially</p> <p>15 abusable medications.</p> <p>16 So, again, very strong,</p> <p>17 emphatic statement of the recognized risk</p> <p>18 and the need to really accelerate</p> <p>19 awareness of that.</p> <p>20 Q. Do you agree with that?</p> <p>21 A. Absolutely.</p> <p>22 Q. Was it your understanding,</p> <p>23 during your time at Endo, that the</p> <p>24 company agreed with that language?</p>	<p style="text-align: right;">Page 541</p> <p>1 know, were you able to have clinicians be</p> <p>2 attracted to the program and participate</p> <p>3 because it's good, quality education,</p> <p>4 it's CE accredited, it's, you know,</p> <p>5 addressing educational gaps and needs</p> <p>6 that they have.</p> <p>7 Q. Do you recall, Ms.</p> <p>8 Kitlinski, discussing with plaintiffs</p> <p>9 their characterization of the amount of</p> <p>10 money that Endo had paid to these</p> <p>11 third-party organizations?</p> <p>12 A. Yes.</p> <p>13 Q. Do you recall plaintiffs</p> <p>14 asking you whether Endo had paid millions</p> <p>15 of dollars to certain organizations?</p> <p>16 A. Yes.</p> <p>17 Q. Did -- did those</p> <p>18 organizations retain that money?</p> <p>19 A. No. And as I tried to point</p> <p>20 out on a few occasions, the educational</p> <p>21 grant that is provided by Endo to any</p> <p>22 professional society, CE provider, or</p> <p>23 other third-party organization, is to</p> <p>24 cover the entire execution of that</p>

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<p style="text-align: right;">Page 542</p> <p>1 educational activity. 2 So that would include things 3 like any associated pass-through 4 expenses, which is -- the majority of an 5 educational grant would be, for example, 6 for -- if it was at a conference, for the 7 audio/visual materials and the setup and 8 the equipment and the personnel; for 9 the -- if there was a food function 10 associated, you know, with the activity, 11 the pass-through expenses for that. 12 The faculty honoraria, the 13 faculty travel expenses, the faculty -- 14 you know, if there were -- well, not 15 if -- the development costs for taking 16 the material that the faculty provides 17 and putting it into an appropriate 18 format, a formatted presentation, for 19 example. Developing the enduring 20 materials, printing or posting to the 21 website. 22 So all of those pass-through 23 expenses are netted -- are not part of 24 the actual grant that is retained by the</p>	<p style="text-align: right;">Page 544</p> <p>1 template either, but I'm just saying 2 the -- 3 Q. Does Exhibit-44 contain 4 handwriting? 5 A. Yes. Printing. 6 Q. Is any of this handwriting 7 on Exhibit-44 yours? 8 A. No. 9 Q. Is any of this handwriting a 10 direct quote of your testimony here 11 today? 12 A. No. 13 Q. How about Exhibit-21, do you 14 recall Exhibit-21? 15 A. Could you scoot that over a 16 little closer? Thanks. 17 Yes, I recall that. 18 Q. Had you ever seen Exhibit-21 19 before today? 20 A. No. 21 Q. Does Exhibit-21 contain 22 handwriting today -- on it? I'm sorry. 23 A. Yes. 24 Q. Is that your handwriting?</p>
<p style="text-align: right;">Page 543</p> <p>1 recipient. They would be retaining the 2 portion that -- of a -- whatever their 3 services were involved with time or the 4 fee for the activity. But -- 5 MS. AMINOLROAYA: 6 Objection -- sorry. 7 THE WITNESS: Sorry. 8 MS. AMINOLROAYA: Objection 9 to form. Foundation. 10 MR. DAVIS: Is that an 11 objection to the question? 12 MS. AMINOLROAYA: It was an 13 objection to the question, yes. 14 MR. DAVIS: A little late. 15 MS. AMINOLROAYA: It's on 16 the record. 17 BY MR. DAVIS: 18 Q. Ms. Kitlinski, do you recall 19 Exhibit-44? 20 A. Yes. 21 Q. Had you ever seen Exhibit-44 22 before today? 23 A. No. It was developed while 24 we were here today. I hadn't seen the</p>	<p style="text-align: right;">Page 545</p> <p>1 A. No. 2 Q. Whose handwriting appears on 3 Exhibit-21? 4 A. It's plaintiffs' counsel. 5 Q. And how about Exhibit-44, 6 whose handwriting is on Exhibit-44? 7 A. Once again, plaintiffs' 8 counsel. 9 Q. And is Exhibit-21, does that 10 handwriting contain a direct quote from 11 your testimony today? 12 A. No. I was asked what I saw 13 on certain reports, and I pointed out the 14 limitations of what I could attest to of 15 my own knowledge and what was there. 16 Q. Okay. 17 MR. DAVIS: For the record, 18 we object to the introduction of 19 these exhibits -- these documents 20 as exhibits. They were created 21 today. They contain 22 mischaracterizations of Ms. 23 Kitlinski's testimony and 24 constitute inappropriate and</p>

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<p style="text-align: right;">Page 546</p> <p>1 improper demonstratives. 2 MS. AMINOLROAYA: It's 3 several hours later. 4 MR. DAVIS: One second. 5 Thank you, Ms. Kitlinski. 6 THE WITNESS: Thank you. 7 VIDEO TECHNICIAN: Going off 8 the record. The time is 8:33 p.m. 9 - - - 10 (Whereupon, a brief recess 11 was taken.) 12 - - - 13 VIDEO TECHNICIAN: We're 14 back on the record at 8:57 p.m. 15 - - - 16 EXAMINATION 17 - - - 18 BY MS. AMINOLROAYA: 19 Q. Ms. Kitlinski, do you recall 20 a discussion you had with your counsel 21 regarding why Endo supported independent 22 education? 23 A. Yes. 24 Q. Can you please look at</p>	<p style="text-align: right;">Page 548</p> <p>1 So this was CD&E's plan, in 2 2000, to sow the field, plant seeds and 3 then water, and then have growth as a 4 result of that, right? 5 MR. DAVIS: Objection to 6 form. 7 THE WITNESS: The 8 characterization of the images is 9 not consistent. So, for example, 10 one of the responsibilities of the 11 clinical liaison team is to go out 12 into the field, so this is the 13 field, you know, that's the 14 context there, and to identify, 15 you know, what the processes are 16 that are in place to identify any 17 issues, which is, you know, sort 18 of the picking up the stones 19 there, if you will, in the second 20 part of the graphic, to be able to 21 identify, shall we say, issues or 22 concerns, like, for example, in 23 the opioid field about the things 24 we've been discussing all day</p>
<p style="text-align: right;">Page 547</p> <p>1 Exhibit-3? 2 And this is CD&E's 2000 3 plan. Page 3, it's called The Critical 4 Connection -- or is entitled, The 5 Critical Connection for Success in 2000 6 and Beyond. 7 Do you see that on Page 3? 8 A. Yes. 9 Q. And let's look at Page 4. I 10 overlooked this imagery before. 11 And what's depicted here is 12 someone is planting seeds, correct? 13 MR. DAVIS: Objection to 14 form. 15 THE WITNESS: Yes, it is 16 a -- it's a depiction of someone 17 sowing -- hoeing a row and 18 planting seeds and watering it. 19 BY MS. AMINOLROAYA: 20 Q. All right. And watering, 21 and then what do we have in the last 22 imagery here, the last image? 23 A. Plants. 24 Q. Plants, right.</p>	<p style="text-align: right;">Page 549</p> <p>1 about public health issues, 2 patient safety issues. 3 And then to -- in terms of 4 the watering, if you will, to be 5 able to identify what resources 6 are needed to address those issues 7 once the stones have been picked 8 out of the field. And to provide 9 care, show that the company is a 10 caring company in that therapeutic 11 area. 12 And at the end of the day, 13 you should have a successful, new 14 therapeutic area that you're 15 involved with. 16 BY MS. AMINOLROAYA: 17 Q. Do you see stones, Ms. 18 Kitlinski? I don't see any stones, and 19 we don't have to spend time on this. 20 A. The second -- the second 21 image. But that's fine. 22 Q. It looks like someone is 23 dropping something on the ground. 24 But what you described is</p>

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<p style="text-align: right;">Page 550</p> <p>1 not what we see on Page 5, right? What</p> <p>2 we see on Page 5 is, on the left-hand</p> <p>3 side, we see relationships, peer</p> <p>4 influence and information.</p> <p>5 So relationships, you</p> <p>6 described some relationships that you</p> <p>7 developed today with therapeutic experts</p> <p>8 or key opinion leaders.</p> <p>9 Peer influence, is that how</p> <p>10 peer influence occurs? When experts in</p> <p>11 the field speak to other doctors at</p> <p>12 continuing medical education programs?</p> <p>13 MR. DAVIS: Objection to</p> <p>14 form.</p> <p>15 THE WITNESS: It's when</p> <p>16 peer-to-peer exchange, scientific</p> <p>17 exchange, goes on, and what one</p> <p>18 therapeutic expert is aware of is</p> <p>19 conveyed to his colleagues.</p> <p>20 BY MS. AMINOLROAYA:</p> <p>21 Q. And information, right?</p> <p>22 Information about opioids?</p> <p>23 A. Information about --</p> <p>24 MR. DAVIS: Objection to</p>	<p style="text-align: right;">Page 552</p> <p>1 opposed to some other companies.</p> <p>2 So it's not surprising that</p> <p>3 we would want to continue that, in having</p> <p>4 a competitive advantage in the pain</p> <p>5 management area.</p> <p>6 MS. AMINOLROAYA: Move to</p> <p>7 strike after the word "yes."</p> <p>8 BY MS. AMINOLROAYA:</p> <p>9 Q. And on Page 8, we see</p> <p>10 intense -- key issues for Endo in 2000</p> <p>11 was intense competition for key advocates</p> <p>12 and influentials, right?</p> <p>13 So these were the</p> <p>14 individuals who delivered your pain</p> <p>15 education, correct?</p> <p>16 MR. DAVIS: Objection to</p> <p>17 form.</p> <p>18 BY MS. AMINOLROAYA:</p> <p>19 Q. The second bullet there</p> <p>20 states, If we don't utilize, Purdue,</p> <p>21 Parke-Davis, Abbott, Janssen will.</p> <p>22 Did I read that correctly?</p> <p>23 A. Yes.</p> <p>24 But if you see in that</p>
<p style="text-align: right;">Page 551</p> <p>1 form.</p> <p>2 THE WITNESS: Information</p> <p>3 about the therapeutic area,</p> <p>4 information about the risks,</p> <p>5 information about the appropriate</p> <p>6 assessment tools.</p> <p>7 As we said, that whole gamut</p> <p>8 of information is appropriate.</p> <p>9 BY MS. AMINOLROAYA:</p> <p>10 Q. Right. And the output of</p> <p>11 that, at least based on what I see on</p> <p>12 Page 5, is one, Competitive advantage for</p> <p>13 Endo.</p> <p>14 Did I read that correctly?</p> <p>15 A. Yes.</p> <p>16 Q. And two is, Expanded use of</p> <p>17 current and future products.</p> <p>18 Did I read that correctly?</p> <p>19 A. Yes.</p> <p>20 And I think I've made no --</p> <p>21 I've been very transparent about the fact</p> <p>22 that I think Endo is a company that has a</p> <p>23 competitive edge, advantage, in how they</p> <p>24 approach their -- their business, as</p>	<p style="text-align: right;">Page 553</p> <p>1 bullet point there, where it says,</p> <p>2 Visiting faculty. Visiting faculty is</p> <p>3 the promotional speakers bureau, that's</p> <p>4 not independent education faculty.</p> <p>5 Publications, again, that's not</p> <p>6 independent education. Phase IV is</p> <p>7 always a necessity, product specific.</p> <p>8 And advisory boards, again, do not fall</p> <p>9 under the purview of independent</p> <p>10 education.</p> <p>11 So when we're talking about</p> <p>12 advocates, that's the context of that,</p> <p>13 and influentials, as opposed to</p> <p>14 therapeutic experts. So just to clarify</p> <p>15 that.</p> <p>16 Q. And if Endo could gain --</p> <p>17 could win over these -- these therapeutic</p> <p>18 experts and key opinion leaders, it would</p> <p>19 give it the competitive advantage, right,</p> <p>20 that you discussed here on Page 5 of this</p> <p>21 presentation, and also provide expanded</p> <p>22 use of current and future products,</p> <p>23 correct?</p> <p>24 MR. DAVIS: Objection to</p>

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<p style="text-align: right;">Page 554</p> <p>1 form.</p> <p>2 THE WITNESS: Certainly, if</p> <p>3 we had the -- if we had</p> <p>4 therapeutic experts who were</p> <p>5 knowledgeable about our data, who</p> <p>6 were knowledgeable about our --</p> <p>7 the Phase IV studies and the</p> <p>8 additional research that we were</p> <p>9 planning, that would give us a</p> <p>10 competitive advantage.</p> <p>11 Having them participate on</p> <p>12 advisory boards and provide</p> <p>13 unfiltered feedback to us so that</p> <p>14 we, as a company, could adjust or</p> <p>15 make any modifications to our plan</p> <p>16 that they suggested, that would</p> <p>17 definitely be a competitive</p> <p>18 advantage, yes.</p> <p>19 BY MS. AMINOLROAYA:</p> <p>20 Q. And on Page 13, CD&E</p> <p>21 strategy, part of this sowing, planting</p> <p>22 and watering strategy, was, Leverage</p> <p>23 strategic alliances and relationships to</p> <p>24 expand utilization of current product</p>	<p style="text-align: right;">Page 556</p> <p>1 Kitlinski, because initiatives that</p> <p>2 combat opiophobia would allow doctors to</p> <p>3 write more prescriptions, correct?</p> <p>4 MR. DAVIS: Objection to</p> <p>5 form.</p> <p>6 THE WITNESS: No. As we --</p> <p>7 we had this discussion earlier</p> <p>8 when you asked that same question.</p> <p>9 As I mentioned, opiophobia</p> <p>10 is not the healthy respect and</p> <p>11 fear of the potential -- the</p> <p>12 potential abuse, misuse,</p> <p>13 addiction, overdose aspects that</p> <p>14 are associated with opioids.</p> <p>15 It's the unwillingness to</p> <p>16 consider that as a -- an</p> <p>17 therapeutic option for patients.</p> <p>18 And also that if they don't</p> <p>19 utilize the medications</p> <p>20 appropriately, you could actually</p> <p>21 have the exact opposite effect of</p> <p>22 what you were just referring to a</p> <p>23 moment ago.</p> <p>24 BY MS. AMINOLROAYA:</p>
<p style="text-align: right;">Page 555</p> <p>1 line.</p> <p>2 Did I read that correctly?</p> <p>3 MR. DAVIS: Objection to</p> <p>4 form.</p> <p>5 THE WITNESS: Yes, that's</p> <p>6 what the slide says.</p> <p>7 Just to correct you, though,</p> <p>8 it was hoeing, not sowing. But</p> <p>9 that's okay.</p> <p>10 BY MS. AMINOLROAYA:</p> <p>11 Q. Thank you.</p> <p>12 A. You're welcome.</p> <p>13 And, again, I don't want to</p> <p>14 keep reiterating this, but just to keep</p> <p>15 in mind the time frame here of 2000, you</p> <p>16 know, early in the company's development,</p> <p>17 not consistent with what the current</p> <p>18 division of responsibilities would be.</p> <p>19 Q. And on Page 13, another</p> <p>20 strategy that CD&E listed here was -- the</p> <p>21 last bullet under leveraging strategic</p> <p>22 alliances is, Support and develop</p> <p>23 initiatives that combat opiophobia.</p> <p>24 And that was important, Ms.</p>	<p style="text-align: right;">Page 557</p> <p>1 Q. Well, the jury can conclude</p> <p>2 what opiophobia means.</p> <p>3 But in 2001 --</p> <p>4 A. Sure.</p> <p>5 Q. -- you would agree that</p> <p>6 doctors had a fear of opioids in the wake</p> <p>7 of what was going on with Purdue and</p> <p>8 OxyContin?</p> <p>9 MR. DAVIS: Objection to</p> <p>10 form.</p> <p>11 THE WITNESS: Again, I will</p> <p>12 just state that my recollection of</p> <p>13 timing is, you know, not -- not</p> <p>14 firm, because I don't have</p> <p>15 documents to refer back to. I do</p> <p>16 know that in the early 2000s there</p> <p>17 were issues of opioid abuse and</p> <p>18 misuse.</p> <p>19 But I think it was not fair</p> <p>20 to characterize it as opiophobia,</p> <p>21 so much as the people utilizing</p> <p>22 these drugs in ways that were not</p> <p>23 appropriate and were not intended</p> <p>24 in the labeling and approved by</p>

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<p style="text-align: right;">Page 558</p> <p>1 the FDA.</p> <p>2 BY MS. AMINOLROAYA:</p> <p>3 Q. And so you don't recall when</p> <p>4 Purdue's problems with OxyContin first</p> <p>5 surfaced in the news?</p> <p>6 MR. DAVIS: Objection to</p> <p>7 form.</p> <p>8 THE WITNESS: As I -- as I</p> <p>9 stated, I recall that it was in</p> <p>10 the early 2000s. Without a frame</p> <p>11 of reference to look back at, I</p> <p>12 don't, I'm sorry.</p> <p>13 BY MS. AMINOLROAYA:</p> <p>14 Q. You had a very good memory</p> <p>15 during Mr. Davis's examination. I will</p> <p>16 note that.</p> <p>17 A. Mr. Davis was examining me</p> <p>18 about the aspects of my job relating to</p> <p>19 educational specifics that I had written,</p> <p>20 the elements for that RiskMAP. So I have</p> <p>21 a very clear recollection of that, as I</p> <p>22 did for when you were asking me about</p> <p>23 education-related things as well.</p> <p>24 Q. And yet another tactic on</p>	<p style="text-align: right;">Page 560</p> <p>1 family physicians, and other</p> <p>2 primary care folks were critical</p> <p>3 to the appropriate pain management</p> <p>4 and that they did not have</p> <p>5 education on that, short of one</p> <p>6 hour during their -- during their</p> <p>7 training programs.</p> <p>8 BY MS. AMINOLROAYA:</p> <p>9 Q. And if we look at Exhibit-2,</p> <p>10 the CD&E objectives that we just</p> <p>11 discussed for clinical development and</p> <p>12 education objectives at Endo, had the</p> <p>13 objective of expanding use of current and</p> <p>14 future products.</p> <p>15 And that's not the only time</p> <p>16 we saw that, Ms. Kitlinski. We also saw</p> <p>17 that goal in Exhibit-2, for example.</p> <p>18 Number 3 in your 1999 objectives stated,</p> <p>19 Maximize corporate return on current</p> <p>20 product lines and seek support for new</p> <p>21 product initiatives, correct?</p> <p>22 MR. DAVIS: Objection to</p> <p>23 form.</p> <p>24 THE WITNESS: Correct. And</p>
<p style="text-align: right;">Page 559</p> <p>1 Page 16 of the document is to establish</p> <p>2 pain management as a priority with PCPs.</p> <p>3 And this was another tactic</p> <p>4 towards the goal of gaining -- that CD&E</p> <p>5 had in the year 2000 of sowing,</p> <p>6 watering -- or, excuse me, hoeing,</p> <p>7 planting seeds and watering in order to</p> <p>8 obtain growth in the opioids market,</p> <p>9 correct?</p> <p>10 MR. DAVIS: Objection to</p> <p>11 form.</p> <p>12 THE WITNESS: No. This was</p> <p>13 referring to the fact that primary</p> <p>14 care physicians -- that the data</p> <p>15 was suggesting that primary care</p> <p>16 physicians were responsible for</p> <p>17 managing the great majority of</p> <p>18 patients with pain, especially as</p> <p>19 the healthcare system evolved and</p> <p>20 visits to specialists became more</p> <p>21 costly and less accessible for</p> <p>22 patients.</p> <p>23 So it was recognizing that</p> <p>24 internal medicine specialists,</p>	<p style="text-align: right;">Page 561</p> <p>1 as we discussed, again, at this</p> <p>2 time, in this early stage of the</p> <p>3 company's development, the focus</p> <p>4 was not on independent education,</p> <p>5 it was on -- as a company,</p> <p>6 everyone had -- your colleague</p> <p>7 commented on the EBITDA term,</p> <p>8 which is certainly not one that I</p> <p>9 would have grasped myself.</p> <p>10 So there were certain</p> <p>11 initiatives that the entire</p> <p>12 company had to embrace as a new</p> <p>13 startup company.</p> <p>14 And, again, the education</p> <p>15 that we're talking about here</p> <p>16 focused on educational</p> <p>17 initiatives, working with the</p> <p>18 professional organizations. And</p> <p>19 the patient organizations were</p> <p>20 not -- were not separate and apart</p> <p>21 from the responsibilities at that</p> <p>22 time.</p> <p>23 BY MS. AMINOLROAYA:</p> <p>24 Q. And this --</p>

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<p style="text-align: right;">Page 562</p> <p>1 A. So I believe -- may I just 2 ask -- never mind. It's probably not 3 appropriate. I can't ask a question, I'm 4 sorry. 5 Q. I'm sorry, it's not. 6 A. Okay. 7 Q. And if we turn to 8 Exhibit-5 -- are you familiar with the 9 IMS data, Ms. Kitlinski? 10 MR. DAVIS: How about you 11 wait until she has the document? 12 THE WITNESS: I know what 13 IMS data is. I don't know, 14 like -- I don't see it. 15 I understand that that's 16 how, for example, the FDA 17 determined how many 18 extended-release, ER -- 19 extended-release and long-acting 20 opioids were being prescribed at 21 the time that they put the REMS in 22 place and how many -- how many 23 prescribers, I should say, not 24 opioids, and that's how they</p>	<p style="text-align: right;">Page 564</p> <p>1 Yes, the same -- again, once 2 again, what we just spoke to, in a 3 young company like that, everyone 4 was all hands on board bringing 5 their -- their aspects to the 6 table of what they can contribute 7 to the launch. 8 BY MS. AMINOLROAYA: 9 Q. All right. And let's turn 10 to Page 14 of Exhibit-5. 11 And Page 14 here, it 12 states -- 13 A. Yes, I have it. I was just 14 looking back to see whose presentation 15 this was. Okay. I got it. 16 Q. We looked at this earlier. 17 This was, Endo Commercial Capabilities 18 Overview by Jeremy Goldberg. We 19 identified that the metadata for this 20 document placed this document as a 2005 21 document. 22 A. Yes. And this particular 23 slide, though, that you're talking about, 24 14, was not Jeremy Goldberg's. He was in</p>
<p style="text-align: right;">Page 563</p> <p>1 determined their goals for what 2 the REMS education should 3 encompass. 4 So I'm familiar with what 5 IMS data is. 6 BY MS. AMINOLROAYA: 7 Q. Thank you. 8 So turning to Page -- 9 Exhibit-5, and we looked at this earlier, 10 regarding Percocet. 11 You had involvement with 12 Percocet, correct? 13 MR. DAVIS: Objection to 14 form. 15 BY MS. AMINOLROAYA: 16 Q. And your 1999 objectives 17 included working with the sales and 18 marketing team to successfully launch 19 Percocet, correct? 20 MR. DAVIS: Objection to 21 form. 22 THE WITNESS: Excuse me one 23 second until I take a look at this 24 again. 1999.</p>	<p style="text-align: right;">Page 565</p> <p>1 the corporate development. 2 But it was, rather, Mark 3 Gossett, who was the senior vice 4 president of the commercial business. 5 Q. Okay. Thank you. 6 A. Sure. 7 Q. And Page 14, Endo describes 8 itself as, The company that Percocet 9 built. 10 Did I read that correctly? 11 A. That's what Mark Gossett 12 described it as in this slide. 13 Q. Do you have reason to 14 dispute that? 15 MR. DAVIS: Objection to 16 form. 17 THE WITNESS: I personally 18 think that Endo is a pain 19 management company that was 20 started by Carol Ammon and her 21 colleagues. 22 But, again, he's a marketing 23 guy, and that's what he's focused 24 on.</p>

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<p style="text-align: right;">Page 566</p> <p>1 BY MS. AMINOLROAYA: 2 Q. And does the second bullet 3 under Percocet state, Endo grew from \$40 4 million to \$214 million by 2003? 5 A. That is what Mr. Gossett 6 says on his slide, yes. 7 Q. And so the CD&E strategy to 8 grow sales and grow the market for 9 Percocet, it worked, Ms. Kitlinski, 10 correct? 11 MR. DAVIS: Objection to 12 form. 13 THE WITNESS: The company's 14 strategy to launch new forms of 15 Percocet that were more 16 available -- I'm sorry, more 17 appropriate, including, as we had 18 talked earlier about Percolone, 19 which was -- did not have the 20 acetaminophen component of that, 21 that contributed towards this. 22 What the CD&E contribution 23 was, I don't know how you would -- 24 how you would gauge that.</p>	<p style="text-align: right;">Page 568</p> <p>1 if that's correct or not. That's 2 Mr. Gossett's representation of 3 the data. 4 BY MS. AMINOLROAYA: 5 Q. If this data is, in fact, 6 correct, this would mean that the -- 7 withdrawn. Let's move on. 8 Earlier you testified -- do 9 you recall offering testimony about 10 ACCME? 11 A. ACCME? 12 Q. Yes. 13 A. Yes. 14 Q. And you said that anyone -- 15 or separate from your testimony from 16 ACCME, but you said anyone can lodge a 17 complaint to a CME-accrediting 18 organization. 19 Do you recall that 20 testimony? 21 MR. DAVIS: Objection to 22 form. 23 THE WITNESS: Yes. 24 BY MS. AMINOLROAYA:</p>
<p style="text-align: right;">Page 567</p> <p>1 BY MS. AMINOLROAYA: 2 Q. But the CD&E, as a member, 3 you were the director of CD&E, and this 4 was your strategy in 1999, right? 5 This was your objective, to 6 grow the market for Percocet? 7 MR. DAVIS: Objection to 8 form. 9 BY MS. AMINOLROAYA: 10 Q. And six years later, we see 11 that Percocet sales quintupled, from \$40 12 million to \$214 million -- I'm sorry, not 13 even six years later. 14 Four years later Percocet 15 sales quintupled from \$40 million to \$214 16 million and Percocet becomes the gold 17 standard in pain management. 18 Approximately 77 percent of 19 prescriptions for Oxycodone with 20 acetaminophen are written as Percocet; is 21 that correct? 22 MR. DAVIS: Objection to 23 form. 24 THE WITNESS: I don't know</p>	<p style="text-align: right;">Page 569</p> <p>1 Q. And did Endo ever lodge such 2 a complaint? 3 MR. DAVIS: Objection to 4 form. 5 THE WITNESS: No. You did 6 ask me that question and I -- as 7 did your previous -- your 8 colleague, and I indicated that I 9 was not aware of that. 10 BY MS. AMINOLROAYA: 11 Q. Let's go to Exhibit-43. 12 Do you recall Mr. Davis 13 asking you some questions about 14 responsible opioid prescribing? 15 MR. DAVIS: Let's wait until 16 she has it in front of her, 17 please. 18 BY MS. AMINOLROAYA: 19 Q. My question doesn't have to 20 do with the document yet. 21 Do you recall the line of 22 questioning? 23 A. The Federation of the State 24 Medical Board, Fishman book, is that what</p>

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<p style="text-align: right;">Page 570</p> <p>1 you're referring to?</p> <p>2 Q. Yes.</p> <p>3 A. Yes.</p> <p>4 Q. And I believe the concern in</p> <p>5 this line of questioning was that not</p> <p>6 enough pages from the book were covered.</p> <p>7 And you may or may not know,</p> <p>8 Mrs. Kitlinski, we have limited time and</p> <p>9 we have to move along. We only have</p> <p>10 seven hours.</p> <p>11 There's certainly more</p> <p>12 content in here that we could cover with</p> <p>13 you. And we can look at one more example</p> <p>14 to address your concern. It's here on</p> <p>15 Page 36 of the document.</p> <p>16 A. 36 up --</p> <p>17 Q. Yes. 423.36.</p> <p>18 A. -- the actual -- okay.</p> <p>19 Q. And I'm only going to read</p> <p>20 the first sentence, for time and for all</p> <p>21 of our sakes.</p> <p>22 A. Sure.</p> <p>23 Q. It says, Beware the</p> <p>24 distinction between pseudoaddiction and</p>	<p style="text-align: right;">Page 572</p> <p>1 second edition by the APS.</p> <p>2 And this was Exhibit -- 12?</p> <p>3 That doesn't sound right.</p> <p>4 MR. DAVIS: 42.</p> <p>5 BY MS. AMINOLROAYA:</p> <p>6 Q. 42.</p> <p>7 So let's look at some of</p> <p>8 these pages.</p> <p>9 A. Sure.</p> <p>10 Q. Page 95. And under,</p> <p>11 Addiction, physical dependence and</p> <p>12 tolerance, if you look at the third</p> <p>13 paragraph under that subheading, it</p> <p>14 states, The prevalence of addiction among</p> <p>15 patients who do not have a previously</p> <p>16 existing substance abuse disorder is low.</p> <p>17 Did I read that correctly?</p> <p>18 A. Yes, you did.</p> <p>19 Q. All right. And following</p> <p>20 that it says, Weissman and Haddox, 1989,</p> <p>21 noted that patients who are given doses</p> <p>22 of opioids that are inadequate to relieve</p> <p>23 their pain or whose opioid dose is</p> <p>24 discontinued abruptly or tapered too</p>
<p style="text-align: right;">Page 571</p> <p>1 addiction.</p> <p>2 A. Yes. We brought that up in</p> <p>3 the past discussion.</p> <p>4 Q. We actually covered more</p> <p>5 than one page --</p> <p>6 A. Yes. And that's why I said</p> <p>7 I wasn't sure how many pages, but --</p> <p>8 Q. Okay. You said we had not</p> <p>9 covered a lot of it, so I wanted to make</p> <p>10 sure we give it some more attention.</p> <p>11 A. Absolutely.</p> <p>12 And my concern was not so</p> <p>13 much the number of pages, but just an</p> <p>14 isolation -- you know, the focus on a</p> <p>15 bullet point such as this as opposed to</p> <p>16 the general gestalt of the book, which</p> <p>17 was that addiction and abuse and misuse</p> <p>18 and overdose are serious societal issues</p> <p>19 that need to be addressed.</p> <p>20 Q. Another complaint that was</p> <p>21 discussed during the examination was that</p> <p>22 we didn't look at particular pages in the</p> <p>23 2002 Guideline for the Management of Pain</p> <p>24 and Osteoarthritis, Rheumatoid Arthritis,</p>	<p style="text-align: right;">Page 573</p> <p>1 rapidly may develop characteristics that</p> <p>2 resemble addiction, which they termed</p> <p>3 iatrogenic pseudoaddiction.</p> <p>4 And the last sentence there</p> <p>5 states, Requests for these specific</p> <p>6 medications and doses should not be</p> <p>7 interpreted as necessarily indicating</p> <p>8 drug-seeking behavior.</p> <p>9 Did I read that correctly?</p> <p>10 A. Yes. It was just the</p> <p>11 intervening section -- sentence there</p> <p>12 that put it into context that, Because</p> <p>13 patients are often knowledgeable about</p> <p>14 their medications and doses that have</p> <p>15 worked in the past, requests for these</p> <p>16 medications and doses should not be</p> <p>17 interpreted as -- necessarily as</p> <p>18 drug-seeking behavior.</p> <p>19 Q. Right. And this paragraph</p> <p>20 frames this in terms of pseudoaddiction,</p> <p>21 correct?</p> <p>22 A. Yes.</p> <p>23 Q. And it relies on the</p> <p>24 Weissman and Haddox article from 1989,</p>

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<p>1 correct?</p> <p>2 A. Correct.</p> <p>3 MR. DAVIS: Objection to</p> <p>4 form.</p> <p>5 BY MS. AMINOLROAYA:</p> <p>6 Q. And if we go to Page 97 of</p> <p>7 the document, we see here, in the</p> <p>8 beginning of the third full paragraph --</p> <p>9 or we can go to the top paragraph here.</p> <p>10 It says, Furthermore,</p> <p>11 decades of clinical experience and</p> <p>12 studies conducted in patients with</p> <p>13 chronic malignant pain due to a variety</p> <p>14 of causes have demonstrated clearly the</p> <p>15 usefulness of opioids in the management</p> <p>16 of a variety of chronic nonmalignant pain</p> <p>17 types.</p> <p>18 Did I read that correctly?</p> <p>19 A. Yes.</p> <p>20 Q. And we read earlier the</p> <p>21 evidence study stating that opioids have</p> <p>22 not been studied for longer than --</p> <p>23 long-term efficacy studies have not been</p> <p>24 conducted for opioids, correct?</p>	<p>1 A. AHRQ.</p> <p>2 Q. AHRQ, thank you.</p> <p>3 And based on the evidence</p> <p>4 study that was prepared for that agency,</p> <p>5 the document stated that long-term</p> <p>6 studies have not been conducted on the</p> <p>7 efficacy of opioids, correct?</p> <p>8 MR. DAVIS: Objection to</p> <p>9 form.</p> <p>10 THE WITNESS: That was</p> <p>11 the -- again, it was a very</p> <p>12 lengthy document, and we just</p> <p>13 looked at a few select items. And</p> <p>14 I'm not saying we should have</p> <p>15 looked at the whole thing.</p> <p>16 But I did not read that full</p> <p>17 document, and so my comments on</p> <p>18 that were just what I said, that</p> <p>19 because of the requirements that</p> <p>20 the FDA puts forth for chronic</p> <p>21 opioids to be approved, that's</p> <p>22 what had been studied and that my</p> <p>23 colleagues in clinical</p> <p>24 development, for example, could</p>
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<p>1 MR. DAVIS: Objection to</p> <p>2 form.</p> <p>3 THE WITNESS: Are you</p> <p>4 referring to here, where it says,</p> <p>5 There is some evidence of a</p> <p>6 positive risk-to-benefit ratio in</p> <p>7 the use of certain opioids for</p> <p>8 people with moderate to severe</p> <p>9 pain?</p> <p>10 BY MS. AMINOLROAYA:</p> <p>11 Q. No. I'm referring to the</p> <p>12 sentence I just read.</p> <p>13 Were you with me?</p> <p>14 A. No, I'm sorry. I was not.</p> <p>15 Q. Let's look back up at the</p> <p>16 top.</p> <p>17 A. I read the -- I did follow</p> <p>18 you there at the top, and I said yes.</p> <p>19 But then I thought you asked</p> <p>20 me about something else.</p> <p>21 Q. Yes. So I said earlier we</p> <p>22 looked at an evidence study that was</p> <p>23 prepared by a governmental agency -- and</p> <p>24 I'm forgetting the acronym right now.</p>	<p>1 speak more appropriately to the</p> <p>2 current -- the current studies</p> <p>3 that are being conducted to</p> <p>4 address that question.</p> <p>5 Because, indeed, it has been</p> <p>6 raised that there is not only</p> <p>7 insufficient long-term evidence</p> <p>8 with regards to the benefits, but</p> <p>9 also the risks. And so both of</p> <p>10 those are being pursued as we</p> <p>11 speak.</p> <p>12 BY MS. AMINOLROAYA:</p> <p>13 Q. And does FDA prevent a</p> <p>14 company like Endo from conducting a study</p> <p>15 on the long-term safety and efficacy of</p> <p>16 opioids?</p> <p>17 MR. DAVIS: Objection to</p> <p>18 form.</p> <p>19 THE WITNESS: No.</p> <p>20 BY MS. AMINOLROAYA:</p> <p>21 Q. Do any FDA regulations</p> <p>22 prevent Endo from conducting such a</p> <p>23 study?</p> <p>24 MR. DAVIS: Objection to</p>

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<p style="text-align: right;">Page 578</p> <p>1 form.</p> <p>2 THE WITNESS: I'm not the</p> <p>3 expert on regulatory issues or</p> <p>4 clinical development issues. So I</p> <p>5 would suggest that you would raise</p> <p>6 that question with my colleagues.</p> <p>7 BY MS. AMINOLROAYA:</p> <p>8 Q. But you mentioned the FDA,</p> <p>9 Ms. Kitlinski --</p> <p>10 A. Yes.</p> <p>11 Q. -- correct?</p> <p>12 You said that the studies</p> <p>13 were limited because of FDA, right?</p> <p>14 A. No. I said the studies were</p> <p>15 limited because that is the requirements</p> <p>16 that the FDA has to obtain approval of a</p> <p>17 new chronic --</p> <p>18 Q. I think we're saying the</p> <p>19 same thing.</p> <p>20 A. Okay. We are on the same</p> <p>21 page.</p> <p>22 Q. So there are certain studies</p> <p>23 that a company may conduct to obtain FDA</p> <p>24 approval.</p>	<p style="text-align: right;">Page 580</p> <p>1 BY MS. AMINOLROAYA:</p> <p>2 Q. And here on Page 97, going</p> <p>3 down to the third paragraph, it states,</p> <p>4 Evidence supports the use of Oxycodone</p> <p>5 for moderate to severe pain that has not</p> <p>6 responded to other treatments.</p> <p>7 Is that correct?</p> <p>8 MR. DAVIS: Objection to</p> <p>9 form.</p> <p>10 THE WITNESS: Yes. And</p> <p>11 that's the case for, again,</p> <p>12 positioning opioid, not -- opioids</p> <p>13 not as a first-line agent, as I</p> <p>14 said when we spoke about this.</p> <p>15 BY MS. AMINOLROAYA:</p> <p>16 Q. And Endo sold generic</p> <p>17 Oxycodone, correct?</p> <p>18 A. Endo had a -- several</p> <p>19 generic opioids and Oxycodone, I believe,</p> <p>20 certainly, at one point in time we did.</p> <p>21 I don't know if we still do.</p> <p>22 Q. And generic -- and Endo sold</p> <p>23 generic OxyContin after the publishing of</p> <p>24 these guidelines in 2002, correct?</p>
<p style="text-align: right;">Page 579</p> <p>1 Does anything prevent a</p> <p>2 company from conducting further studies?</p> <p>3 A. No.</p> <p>4 MR. DAVIS: Objection to</p> <p>5 form.</p> <p>6 THE WITNESS: As is what</p> <p>7 Endo is doing.</p> <p>8 BY MS. AMINOLROAYA:</p> <p>9 Q. And Endo had not</p> <p>10 conducted -- has not conducted those</p> <p>11 studies in the past, correct?</p> <p>12 MR. DAVIS: Objection to</p> <p>13 form.</p> <p>14 THE WITNESS: They have</p> <p>15 conducted longer studies, but</p> <p>16 these are long -- you know, longer</p> <p>17 yet than the originals.</p> <p>18 And, again, I'm not the</p> <p>19 expert on what length of studies</p> <p>20 we have conducted at Endo. So</p> <p>21 when you folks speak to the</p> <p>22 clinical development -- I'm sorry,</p> <p>23 to the R&D people, they would be</p> <p>24 able to apprise you of that.</p>	<p style="text-align: right;">Page 581</p> <p>1 MR. DAVIS: Objection to</p> <p>2 form.</p> <p>3 THE WITNESS: I don't know</p> <p>4 the answer to that question.</p> <p>5 BY MS. AMINOLROAYA:</p> <p>6 Q. Okay.</p> <p>7 A. Because OxyContin was a</p> <p>8 different formulation than -- this is</p> <p>9 just saying generic Oxycodone, which is</p> <p>10 the active ingredient, for example, in</p> <p>11 Percocet. It's not an extended-release</p> <p>12 formulation of that.</p> <p>13 Q. Right. And you discussed</p> <p>14 some of your significant responsibilities</p> <p>15 with the RiskMAP.</p> <p>16 Do you recall there being a</p> <p>17 RiskMAP for generic OxyContin during the</p> <p>18 time period that Endo sold it?</p> <p>19 MR. DAVIS: Objection to form.</p> <p>20 THE WITNESS: Again, I don't</p> <p>21 recall there being a discussion,</p> <p>22 because I don't recall that I was</p> <p>23 there when Endo sold it, if</p> <p>24 indeed, they did. So I don't</p>

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<p style="text-align: right;">Page 582</p> <p>1 know.</p> <p>2 BY MS. AMINOLROAYA:</p> <p>3 Q. So you recall the RiskMAP</p> <p>4 for Opana ER, but you don't recall the</p> <p>5 RiskMAP for generic OxyContin?</p> <p>6 A. The RiskMAP for --</p> <p>7 MR. DAVIS: Object to form.</p> <p>8 THE WITNESS: The RiskMAP</p> <p>9 for generic -- I'm sorry, for</p> <p>10 Opana ER was negotiated and put in</p> <p>11 place with the FDA while I was</p> <p>12 responsible for that. So, yes, I</p> <p>13 definitely recall that. I was</p> <p>14 involved in it.</p> <p>15 BY MS. AMINOLROAYA:</p> <p>16 Q. You don't recall a RiskMAP</p> <p>17 for generic Oxycodone or generic</p> <p>18 OxyContin?</p> <p>19 MR. DAVIS: Objection to</p> <p>20 form.</p> <p>21 THE WITNESS: As I said, I</p> <p>22 don't even recall if we sold that</p> <p>23 drug.</p> <p>24 BY MS. AMINOLROAYA:</p>	<p style="text-align: right;">Page 584</p> <p>1 in one of these slides. It's a</p> <p>2 self-administered form -- excuse me, it's</p> <p>3 a fourteen-item self-administered form</p> <p>4 capturing the primary determinants of</p> <p>5 aberrant drug-related behavior.</p> <p>6 Did I read that correctly?</p> <p>7 A. I'm sorry, I was assisting</p> <p>8 to locate an item.</p> <p>9 A fourteen-item</p> <p>10 self-administered form capturing the</p> <p>11 primary determinants of aberrant</p> <p>12 drug-related behavior, yes.</p> <p>13 Q. And this was something that</p> <p>14 was -- that Endo suggested to doctors</p> <p>15 could be used to manage the risks of</p> <p>16 addiction, correct?</p> <p>17 MR. DAVIS: Objection to</p> <p>18 form.</p> <p>19 THE WITNESS: The SOAPP tool</p> <p>20 was the -- if you recall earlier,</p> <p>21 we talked about psychometrically</p> <p>22 validated tools that were</p> <p>23 supported by funding from NIDA or</p> <p>24 from NIH, and that Endo also</p>
<p style="text-align: right;">Page 583</p> <p>1 Q. Convenient.</p> <p>2 A. No. Just the fact that the</p> <p>3 generic formulations change, literally,</p> <p>4 from month to month and year to year, and</p> <p>5 that was quite a number of years ago.</p> <p>6 Q. And another -- let's turn</p> <p>7 back to Exhibit-40.</p> <p>8 Another complaint that was</p> <p>9 lodged about our review of the APS</p> <p>10 residents course was also that we didn't</p> <p>11 cover enough pages here.</p> <p>12 Turning to Page 34 of the</p> <p>13 document, the second slide on this page</p> <p>14 mentions, Screener and opioid assessment</p> <p>15 for patients in pain, or SOAPP.</p> <p>16 You're familiar with SOAPP,</p> <p>17 Ms. Kitlinski?</p> <p>18 A. Yes.</p> <p>19 Q. And this relates to opioids,</p> <p>20 right?</p> <p>21 So this addresses your</p> <p>22 concern that we weren't addressing slides</p> <p>23 that had to do with opioids.</p> <p>24 And, here, SOAPP is included</p>	<p style="text-align: right;">Page 585</p> <p>1 provided some educational grant</p> <p>2 support towards.</p> <p>3 So this was a tool that was</p> <p>4 developed -- and I don't recall if</p> <p>5 it was NIDA or NIH, but it was</p> <p>6 funding from them. And then Endo</p> <p>7 provided educational -- additional</p> <p>8 educational grants so that the</p> <p>9 beta -- the beta version of it,</p> <p>10 once they received the feedback</p> <p>11 from clinicians as to what would</p> <p>12 work in their practice on a</p> <p>13 day-to-day basis, they were able</p> <p>14 to modify that so it could be</p> <p>15 practical and inserted into their</p> <p>16 patient care.</p> <p>17 BY MS. AMINOLROAYA:</p> <p>18 Q. And I think my question was,</p> <p>19 SOAPP was something that Endo suggested</p> <p>20 to doctors could be used to manage the</p> <p>21 risks of addiction; is that right?</p> <p>22 MR. DAVIS: Objection to</p> <p>23 form.</p> <p>24 THE WITNESS: SOAPP was part</p>

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<p style="text-align: right;">Page 586</p> <p>1 of the independent educational</p> <p>2 activities. And so this is --</p> <p>3 this is not Endo suggesting SOAPP,</p> <p>4 this is the APS residents course.</p> <p>5 It's not that Endo did not,</p> <p>6 you know, speak to the value of</p> <p>7 SOAPP. I didn't mean to imply</p> <p>8 that. But I just want to be clear</p> <p>9 that this was the faculty for the</p> <p>10 program.</p> <p>11 And we did, indeed -- and we</p> <p>12 did, indeed, recognize the value</p> <p>13 of SOAPP, because the FDA, NIH and</p> <p>14 NIDA had acknowledged its</p> <p>15 importance by virtue of the fact</p> <p>16 that they supported ongoing</p> <p>17 research with it and utilized it</p> <p>18 as one of the tools that they --</p> <p>19 when they were conducting their</p> <p>20 evaluations.</p> <p>21 BY MS. AMINOLROAYA:</p> <p>22 Q. When did FDA support</p> <p>23 research of SOAPP?</p> <p>24 A. FDA did not. NIDA or NIH</p>	<p style="text-align: right;">Page 588</p> <p>1 Q. And the key point is, No</p> <p>2 study evaluated the effectiveness of risk</p> <p>3 prediction instruments for reducing</p> <p>4 outcomes related to overdose, addiction,</p> <p>5 abuse or misuse. SOE: Insufficient.</p> <p>6 Did I read that correctly?</p> <p>7 A. Yes.</p> <p>8 And I just wanted to see</p> <p>9 what this citation here, 113 and 14 is</p> <p>10 that they're citing, because it seems at</p> <p>11 odds with the fact that they're saying</p> <p>12 there was no study, and yet they have a</p> <p>13 citation.</p> <p>14 So just give me one moment</p> <p>15 to look what they --</p> <p>16 Q. Well, we can look at --</p> <p>17 let's look at Question 4A on Page 86.</p> <p>18 A. Okay.</p> <p>19 Q. Key Question 4A is, In</p> <p>20 patients with chronic pain being</p> <p>21 considered --</p> <p>22 A. Excuse me just one second</p> <p>23 here. I'm just trying to get to that</p> <p>24 page.</p>
<p style="text-align: right;">Page 587</p> <p>1 did, yes.</p> <p>2 Q. And SOAPP was part of the</p> <p>3 RiskMAP for Opana ER, correct?</p> <p>4 A. Yes.</p> <p>5 Q. However, when the evidence</p> <p>6 report was prepared for AHRQ -- if you</p> <p>7 turn to Exhibit-24.</p> <p>8 A. I'm sorry, I missed what</p> <p>9 page you said.</p> <p>10 Q. So let's go to Page 90 of</p> <p>11 the document.</p> <p>12 I can assure you there's</p> <p>13 more discussion of SOAPP in here. I'm</p> <p>14 going to point you to one to move us</p> <p>15 along.</p> <p>16 A. Sure.</p> <p>17 Q. So here on Page 90, the key</p> <p>18 question in 4B is, In patients with</p> <p>19 chronic pain, what is the effectiveness</p> <p>20 of use of risk prediction instruments on</p> <p>21 outcomes related to overdose, addiction,</p> <p>22 abuse or misuse?</p> <p>23 Did I read that correctly?</p> <p>24 A. Yes.</p>	<p style="text-align: right;">Page 589</p> <p>1 46, you said?</p> <p>2 4A, okay. I have it.</p> <p>3 That's on Page 41.</p> <p>4 Q. In patients with chronic</p> <p>5 pain being considered for long-term</p> <p>6 opioid therapy, what is the accuracy of</p> <p>7 instruments for predicting risk of opioid</p> <p>8 overdose, addiction, abuse or misuse?</p> <p>9 Did I read that correctly?</p> <p>10 A. Yes.</p> <p>11 Q. And the first point there</p> <p>12 is, Three studies (one fair quality, two</p> <p>13 poor quality) evaluated the opioid risk</p> <p>14 tool, ORT, using a cutoff of more than or</p> <p>15 equal to 4. Estimates of diagnostic</p> <p>16 accuracy were inconsistent, precluding</p> <p>17 reliable conclusions.</p> <p>18 Did I read that correctly?</p> <p>19 A. Yes.</p> <p>20 Q. And let's go to the next</p> <p>21 bullet, because that one addresses SOAPP.</p> <p>22 It says, Two studies</p> <p>23 evaluated the screening and opioid</p> <p>24 assessment for patients with pain (SOAPP)</p>

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<p style="text-align: right;">Page 590</p> <p>1 Version 1 instrument. In one fair 2 quality study, based on a cutoff score of 3 more than or equal to 8, sensitivity was 4 .68. 5 And we can go over all these 6 details. 7 But we see in the next 8 bullet, it states, One poor quality 9 study -- and it goes on to describe that. 10 The third bullet also 11 references one poor quality study. 12 And the last bullet there 13 references one poor quality study. 14 Is that correct? 15 A. That's what it says, yes. 16 And I do want to point out 17 that, again, the bullet point above here 18 is talking about SOAPP, Version 1, which 19 we -- you know, which we referred to 20 briefly a moment ago, that that was the 21 first iteration that NIH and/or NIDA or 22 HHS supported, and that it was 23 subsequently revised. 24 So I don't know that the --</p>	<p style="text-align: right;">Page 592</p> <p>1 been used in any long-term studies 2 because those long-term studies 3 are just beginning to go on, as we 4 talked about a short while ago. 5 BY MS. AMINOLROAYA: 6  7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23 24</p>
<p style="text-align: right;">Page 591</p> <p>1 I don't know that they have that included 2 in here. This is certainly a recent 3 publication. 4 Q. Yes. This is 2014. 5 So if these tools of -- 6 studies had not shown efficacy for these 7 studies in 2014 -- excuse me, for these 8 risk prediction instruments in 2014, had 9 they done that before then? 10 MR. DAVIS: Objection to 11 form. 12 THE WITNESS: And I think 13 the question here is, as it states 14 all throughout this section and 15 through the title of this 16 document, is the -- documenting 17 the risks of long-term opioid -- 18 of documenting the risks and 19 effectiveness of long-term opioid 20 therapy. 21 And the SOAPP instrument 22 hasn't been used in any -- as any 23 of these others for that point, 24 you know, DIRE or ORT, have not</p>	<p style="text-align: right;">Page 593</p> <p>1  2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23 24</p>

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<p>Page 603</p> <p>1 [REDACTED]</p> <p>2 [REDACTED]</p> <p>3 [REDACTED]</p> <p>4 [REDACTED]</p> <p>5 [REDACTED]</p> <p>6 [REDACTED]</p> <p>7 [REDACTED]</p> <p>8 [REDACTED]</p> <p>9 [REDACTED]</p> <p>10 [REDACTED]</p> <p>11 [REDACTED]</p> <p>12 [REDACTED]</p> <p>13 [REDACTED]</p> <p>14 [REDACTED]</p> <p>15 [REDACTED]</p> <p>16 [REDACTED]</p> <p>17 [REDACTED]</p> <p>18 [REDACTED]</p> <p>19 [REDACTED]</p> <p>20 [REDACTED]</p> <p>21 [REDACTED]</p> <p>22 [REDACTED]</p> <p>23 [REDACTED]</p> <p>24 [REDACTED]</p>	<p>Page 605</p> <p>1 [REDACTED]</p> <p>2 [REDACTED]</p> <p>3 [REDACTED]</p> <p>4 [REDACTED]</p> <p>5 [REDACTED]</p> <p>6 [REDACTED]</p> <p>7 [REDACTED]</p> <p>8 [REDACTED]</p> <p>9 [REDACTED]</p> <p>10 [REDACTED]</p> <p>11 [REDACTED]</p> <p>12 [REDACTED]</p> <p>13 [REDACTED]</p> <p>14 [REDACTED]</p> <p>15 [REDACTED]</p> <p>16 [REDACTED]</p> <p>17 [REDACTED]</p> <p>18 [REDACTED]</p> <p>19 [REDACTED]</p> <p>20 [REDACTED]</p> <p>21 [REDACTED]</p> <p>22 [REDACTED]</p> <p>23 [REDACTED]</p> <p>24 [REDACTED]</p>


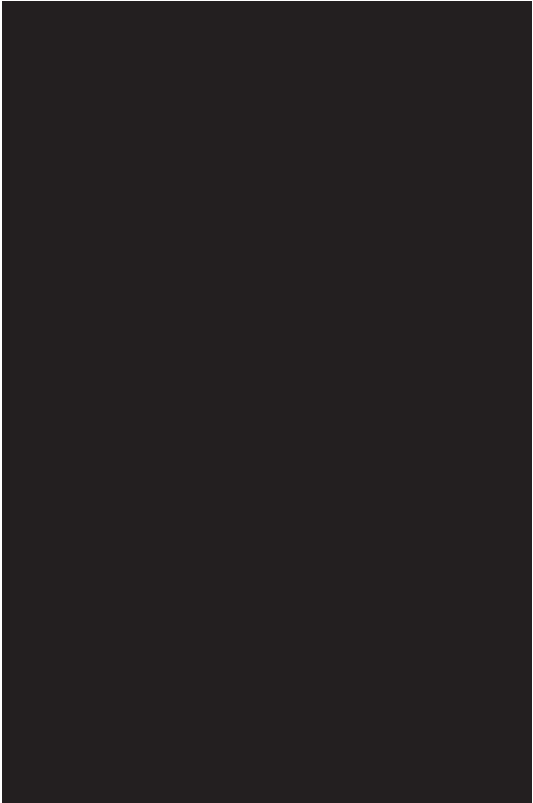


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<p>Page 606</p> <p>1 [REDACTED]</p> <p>2 [REDACTED]</p> <p>3 [REDACTED]</p> <p>4 [REDACTED]</p> <p>5 [REDACTED]</p> <p>6 [REDACTED]</p> <p>7 [REDACTED]</p> <p>8 [REDACTED]</p> <p>9 [REDACTED]</p> <p>10 [REDACTED]</p> <p>11 [REDACTED]</p> <p>12 [REDACTED]</p> <p>13 [REDACTED]</p> <p>14 [REDACTED]</p> <p>15 [REDACTED]</p> <p>16 [REDACTED]</p> <p>17 [REDACTED]</p> <p>18 [REDACTED]</p> <p>19 [REDACTED]</p> <p>20 [REDACTED]</p> <p>21 [REDACTED]</p> <p>22 [REDACTED]</p> <p>23 [REDACTED]</p> <p>24 [REDACTED]</p>	<p>Page 608</p> <p>1 [REDACTED]</p> <p>2 [REDACTED]</p> <p>3 [REDACTED]</p> <p>4 [REDACTED]</p> <p>5 [REDACTED]</p> <p>6 [REDACTED]</p> <p>7 [REDACTED]</p> <p>8 [REDACTED]</p> <p>9 [REDACTED]</p> <p>10 [REDACTED]</p> <p>11 [REDACTED]</p> <p>12 [REDACTED]</p> <p>13 [REDACTED]</p> <p>14 [REDACTED]</p> <p>15 [REDACTED]</p> <p>16 [REDACTED]</p> <p>17 [REDACTED]</p> <p>18 [REDACTED]</p> <p>19 [REDACTED]</p> <p>20 [REDACTED]</p> <p>21 [REDACTED]</p> <p>22 [REDACTED]</p> <p>23 [REDACTED]</p> <p>24 [REDACTED]</p>
<p>Page 607</p> <p>1 [REDACTED]</p> <p>2 [REDACTED]</p> <p>3 [REDACTED]</p> <p>4 [REDACTED]</p> <p>5 [REDACTED]</p> <p>6 [REDACTED]</p> <p>7 [REDACTED]</p> <p>8 [REDACTED]</p> <p>9 [REDACTED]</p> <p>10 [REDACTED]</p> <p>11 [REDACTED]</p> <p>12 [REDACTED]</p> <p>13 [REDACTED]</p> <p>14 [REDACTED]</p> <p>15 [REDACTED]</p> <p>16 [REDACTED]</p> <p>17 [REDACTED]</p> <p>18 [REDACTED]</p> <p>19 [REDACTED]</p> <p>20 [REDACTED]</p> <p>21 [REDACTED]</p> <p>22 [REDACTED]</p> <p>23 [REDACTED]</p> <p>24 [REDACTED]</p>	<p>Page 609</p> <p>1 [REDACTED]</p> <p>2 [REDACTED]</p> <p>3 [REDACTED]</p> <p>4 [REDACTED]</p> <p>5 [REDACTED]</p> <p>6 [REDACTED]</p> <p>7 [REDACTED]</p> <p>8 [REDACTED]</p> <p>9 [REDACTED]</p> <p>10 [REDACTED]</p> <p>11 [REDACTED]</p> <p>12 [REDACTED]</p> <p>13 [REDACTED]</p> <p>14 [REDACTED]</p> <p>15 [REDACTED]</p> <p>16 [REDACTED]</p> <p>17 [REDACTED]</p> <p>18 [REDACTED]</p> <p>19 [REDACTED]</p> <p>20 [REDACTED]</p> <p>21 [REDACTED]</p> <p>22 [REDACTED]</p> <p>23 [REDACTED]</p> <p>24 [REDACTED]</p>

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<p>Page 610</p> <p>1 2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23 24</p> 	<p>Page 612</p> <p>1 2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23 24</p> 
<p>Page 611</p> <p>1 2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23 24</p> 	<p>Page 613</p> <p>1 2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23 24</p> 




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<p style="text-align: right;">Page 614</p> <p>1 [REDACTED] 2 [REDACTED] 3 [REDACTED] 4 [REDACTED] 5 [REDACTED] 6 [REDACTED] 7 [REDACTED] 8 [REDACTED] 9 [REDACTED] 10 [REDACTED] 11 [REDACTED] 12 [REDACTED] 13 [REDACTED] 14 [REDACTED] 15 [REDACTED] 16 [REDACTED] 17 [REDACTED] 18 [REDACTED] 19 [REDACTED] 20 [REDACTED] 21 [REDACTED] 22 [REDACTED] 23 [REDACTED] 24 [REDACTED]</p>	<p style="text-align: right;">Page 616</p> <p>1 just ask that you show the 2 courtesy -- 3 MS. AMINOLROAYA: It's 10:00 4 p m., and we're doing our best. 5 I'm sure you can appreciate that. 6 MR. DAVIS: That doesn't 7 change the clarity of the CMOs. 8 Take a look. 9 MS. AMINOLROAYA: And the 10 document is available on the 11 screen, and the trial tech can -- 12 will flip to the page that we're 13 looking at. 14 - - - 15 (Whereupon, Endo-Kitlinski 16 Exhibit-52, 17 ENDO-OPIOID_MDL_DEPONENT 18 000000184-189, was marked for 19 identification.) 20 - - - 21 BY MS. AMINOLROAYA: 22 [REDACTED] 23 [REDACTED] 24 [REDACTED]</p>
<p style="text-align: right;">Page 615</p> <p>1 [REDACTED] 2 [REDACTED] 3 [REDACTED] 4 [REDACTED] 5 [REDACTED] 6 [REDACTED] 7 [REDACTED] 8 [REDACTED] 9 MS. AMINOLROAYA: We're 10 marking Exhibit-52. And I 11 apologize, it's 10:00 p.m. in the 12 evening, we were able to get one 13 copy of this document, which I'm 14 going to give you. 15 The trial tech is also going 16 to pull up a copy on the screens, 17 and we'll give this to the court 18 reporter. And we'll provide you 19 with a copy. 20 MR. DAVIS: I think the 21 requirements for providing 22 opposing counsel with exhibits is 23 pretty darn clear. 24 But we can go ahead here and</p>	<p style="text-align: right;">Page 617</p> <p>1 [REDACTED] 2 [REDACTED] 3 [REDACTED] 4 [REDACTED] 5 [REDACTED] 6 [REDACTED] 7 [REDACTED] 8 [REDACTED] 9 [REDACTED] 10 [REDACTED] 11 [REDACTED] 12 [REDACTED] 13 [REDACTED] 14 [REDACTED] 15 [REDACTED] 16 [REDACTED] 17 [REDACTED] 18 [REDACTED] 19 [REDACTED] 20 [REDACTED] 21 [REDACTED] 22 [REDACTED] 23 [REDACTED] 24 [REDACTED]</p>

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<p>Page 618</p> <p>1 2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23 24</p> 	<p>Page 620</p> <p>1 2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23 24</p> 
<p>Page 619</p> <p>1 2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23 24</p> 	<p>Page 621</p> <p>1 2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23 24</p> 

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<p style="text-align: right;">Page 622</p> <p>1 [REDACTED]</p> <p>2 [REDACTED]</p> <p>3 [REDACTED]</p> <p>4 MR. DAVIS: Objection to the</p> <p>5 form. That's all the time we</p> <p>6 have.</p> <p>7 MS. AMINOLROAYA: How much</p> <p>8 time do I have left?</p> <p>9 VIDEO TECHNICIAN: That was</p> <p>10 one hour --</p> <p>11 MR. DAVIS: Okay. You're</p> <p>12 done.</p> <p>13 MS. AMINOLROAYA: I just</p> <p>14 have one more question with this,</p> <p>15 if counsel would indulge me.</p> <p>16 MR. DAVIS: We gave Dave</p> <p>17 five extra minutes --</p> <p>18 MS. AMINOLROAYA: I just</p> <p>19 have literally one more</p> <p>20 question --</p> <p>21 MR. DAVIS: You're done.</p> <p>22 MS. AMINOLROAYA: -- that</p> <p>23 will take 60 seconds.</p> <p>24 MR. DAVIS: Thank you.</p>	<p style="text-align: right;">Page 624</p> <p>1 CERTIFICATE</p> <p>2</p> <p>3</p> <p>4 I HEREBY CERTIFY that the</p> <p>5 witness was duly sworn by me and that the</p> <p>6 deposition is a true record of the</p> <p>7 testimony given by the witness.</p> <p>8</p> <p>9</p> <p>10</p> <p>11 Amanda Maslinsky-Miller</p> <p>12 Certified Realtime Reporter</p> <p>13 Dated: January 16, 2018</p> <p>14</p> <p>15</p> <p>16</p> <p>17 (The foregoing certification</p> <p>18 of this transcript does not apply to any</p> <p>19 reproduction of the same by any means,</p> <p>20 unless under the direct control and/or</p> <p>21 supervision of the certifying reporter.)</p> <p>22</p> <p>23</p> <p>24</p>
<p style="text-align: right;">Page 623</p> <p>1 MS. AMINOLROAYA: It will</p> <p>2 take 60 seconds.</p> <p>3 MR. DAVIS: We're off the</p> <p>4 record. We're done.</p> <p>5 VIDEO TECHNICIAN: This ends</p> <p>6 today's deposition. We're going</p> <p>7 off the record at 10:04 p.m.</p> <p>8 - - -</p> <p>9 (Whereupon, the deposition</p> <p>10 concluded at 10:04 p.m.)</p> <p>11 - - -</p> <p>12</p> <p>13</p> <p>14</p> <p>15</p> <p>16</p> <p>17</p> <p>18</p> <p>19</p> <p>20</p> <p>21</p> <p>22</p> <p>23</p> <p>24</p>	<p style="text-align: right;">Page 625</p> <p>1 INSTRUCTIONS TO WITNESS</p> <p>2</p> <p>3 Please read your deposition</p> <p>4 over carefully and make any necessary</p> <p>5 corrections. You should state the reason</p> <p>6 in the appropriate space on the errata</p> <p>7 sheet for any corrections that are made.</p> <p>8 After doing so, please sign</p> <p>9 the errata sheet and date it.</p> <p>10 You are signing same subject</p> <p>11 to the changes you have noted on the</p> <p>12 errata sheet, which will be attached to</p> <p>13 your deposition.</p> <p>14 It is imperative that you</p> <p>15 return the original errata sheet to the</p> <p>16 deposing attorney within thirty (30) days</p> <p>17 of receipt of the deposition transcript</p> <p>18 by you. If you fail to do so, the</p> <p>19 deposition transcript may be deemed to be</p> <p>20 accurate and may be used in court.</p> <p>21</p> <p>22</p> <p>23</p> <p>24</p>

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